LORAIN COUNTY STORM WATER DISTRICT

STORM WATER MANAGEMENT PROGRAM

December 2021
3GQ10012*DG

Prepared by:

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LIST OF ACROYNMS/ABBREVIATIONS

BMP	Best Management Practice
EPA	Environmental Protection Agency
ESC	Erosion & Sediment Control
HSTS	Home Sewage Treatment Systems
IDDE	Illicit Discharge Detection and Elimination
LCPIPE	Lorain County Public Information & Public Education
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
ORC	Ohio Revised Code
O & M	Operation and Maintenance
PPGHP	Pollution Prevention and Good Housekeeping Program
SWAC	Storm Water Advisory Committee
SWCD	Soil & Water Conservation District
SWD	Lorain County Storm Water District
SWMD	Solid Waste Management District
SWMP	Storm Water Management Program
SWMT	Storm Water Management Team
SWP3/SWPPP	Storm Water Pollution Prevention Plan

ACKNOWLEDGMENTS

KEM would like to acknowledge the numerous agencies and departments that assisted with the development of this storm water management program. Specifically, the Lorain County Administrator, Community Development, the County Engineer's Office, the Prosecutor's Office, Soil and Water Conservation District and the Ohio EPA which provided important guidance, input and background information that significantly contributed to the improvement of this program.

1. Introduction

On December 27, 2002 Ohio EPA issued an NPDES General Permit (Permit No.: OHQ000001) to authorize small Municipal Separate Storm Sewer Systems (MS4s) to discharge storm water under the National Pollutant Discharge Elimination System (NPDES). This permit was developed as a result of U.S. EPA's Phase II storm water program. The Phase II regulations required that MS4s which serve populations of less than 100,000 and which are located partially or fully within urbanized areas, as based on US census data, apply for coverage under this permit and submit a Storm Water Management Program (SWMP) to Ohio EPA by March 10, 2003. The OEPA has issued three renewals to the permit (2009, 2014, 2021), with the latest being OHQ00004 (2021). Each renewal of the permit has added additional requirements. Lorain County along with eight townships and two municipalities within the County, who were defined by Ohio EPA to be Phase II Small MS4s have combined efforts under 1 permit. This SWMP is intended to combine efforts of the County and the communities listed below by having the County be the permit holder with the Townships, the City of Oberlin, and the Village of South Amherst under the County as co-permittees.

- Amherst Township
- Carlisle Township
- Columbia Township
- Eaton Township
- City of Oberlin
- Elyria Township
- Grafton Township
- New Russia Township – Granted a waiver
- Sheffield Township
- Henrietta Township
- Village of South Amherst

Of these MS4 communities, ten are currently permit holders. New Russia Township requested and was granted a waiver by Ohio EPA. The 2020 census is also expected to add additional area and potentially additional townships to the MS4 program. As part of this SWMP additional areas and additional townships will plan to come into compliance with the SWMP over a five year period. Lorain county and the 10 other entities have filed for coverage under the current permit and were assigned a NOI number 3GQ10012*DG by the Ohio EPA.

The SWMP defines legal authority to develop, implement and enforce the permit requirements. It also establishes the permit coverage area, organizational structure and addresses the following six minimum control measures (MCM) as required by the permit:

1. MCM #1 - Public Education and Outreach on Storm Water Impacts
2. MCM #2 - Public Involvement/Participation
3. MCM #3 - Illicit Discharge Detection and Elimination
4. MCM #4 - Construction Site Storm Water Runoff Control

5. MCM #5 - Post-Construction Storm Water Management in New Development and Redevelopment

6. MCM #6 - Pollution Prevention/Good Housekeeping for Municipal Operations

The Lorain County Leaders and Elected Officials realizing the magnitude of the permit requirements, made the decision to lead and manage the NPDES Permit and stormwater plan process and to take advantage of the potential resource efficiencies and cost savings through the economies of scale, invited the MS4 communities to join the County in developing a regional program. All of the communities have agreed to combine their programs with and allow the County to lead by forming a single regional Storm Water District (SWD) with a combined SWMP. As part of that agreement each community and the County have signed a **Memorandum of Understanding (MOU)** with details on responsibilities for each party. A sample copy of the MOU is attached as Exhibit 1 – Community MOUs. The MS4 communities have also submitted a MS4 Co-Permittee application with Lorain County as the lead permittee. The SWMP also explains responsibilities of each party based on BMP's that have been or will be implemented.

1.1. Legal authority

Lorain County has created a Sanitary and Storm Water district based on Ohio Revised Code (ORC) 6117 which provides the legal authority for implementation of the SWMP. This SWD encompasses the entire unincorporated area of Lorain County (Resolution No. 83-433, dated May 3, 1982).

The legal authority for the City of Oberlin and the Village of South Amherst to control the quality of separate storm water is derived from Article XVIII, Section 3 of the Ohio Constitution which grants municipalities the legal authority to exercise all powers of self-government and to adopt and enforce within their limits such local police, sanitary, and other similar regulations as are not in conflict with general laws.

1.2. Permit Coverage Area

The SWMP covers the unincorporated urbanized areas of Lorain County, the City of Oberlin and the Village of South Amherst. Urbanized areas are determined by the U.S. Bureau of Census and as outlined on Figure 1 – Lorain County Urbanized Areas. These areas were updated with the release of the 2010 Census data. Updates to the urbanized area based on the 2020 Census will be incorporated in this SWMP when the 2020 census data is released.

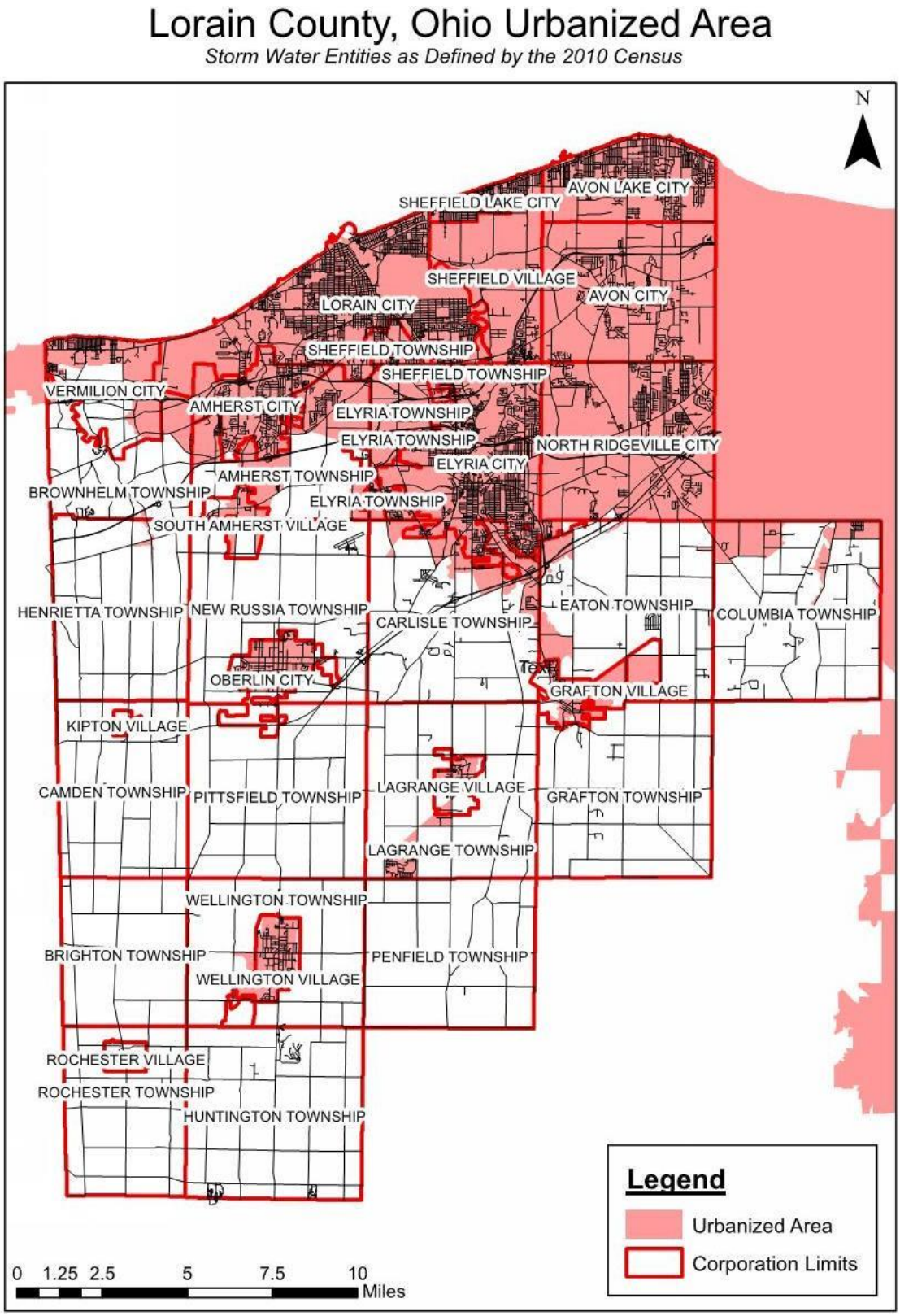

Figure 1 – Lorain County Urbanized Areas

The Urbanized Area inside Lorain County includes a population of approximately 265,983 based on the 2010 census. This includes all incorporated (Pop. 245,040) and unincorporated areas (Pop. 20,943). Since this SWMP only covers the unincorporated areas of the County, the Village of South Amherst and the City of Oberlin (Pop. 8,286), the population it serves is approximately 28,289. The 2010 census also states that on average there are 2.51 people per home within the County.

2. Management of the Storm Water Program/District

2.1. Organizational Structure

Lorain County has created a Storm Water District (SWD) under the authority of the Ohio Revised Code (ORC) 6117 which identifies the Lorain County Board of Commissioners as the responsible entity for said District. The SWMP is a part of the SWD and will be managed overall by the Board of Commissioners. Day to day management of the SWMP will be the responsibility of the Storm Water Management Team comprised of the County Administrator, the Community Development Director and the County Engineer. Each manager has specific duties as outlined in Figure 2. with regard to the SWMP, the Community Development Director will be the Point of Contact and will be responsible for ensuring that the SWMP is in compliance with the permit.

To help facilitate the storm water needs of the MS4 communities and County, and to adhere to the NPDES permit requirements suggested by EPA, the Board of Commissioners created a Storm Water Advisory Committee (SWAC) made up of the following members:

- County Administrator
- County Engineer
- Chief Deputy Engineer
- Assistant Lorain County Prosecutor
- Soil and Water Conservation District Board Member
- Township Trustee Board Representative
- City of Oberlin Representative
- Business Owner
- Farm Bureau Board Representative
- Developer
- Environmentalist
- Watershed Coordinator
- Secretary

The role of the SWAC is to review, discuss and provide input on the Lorain SWD and SWMP to the Board of Commissioners. The SWAC will be responsible for review, providing input and recommending changes to the SWMP.

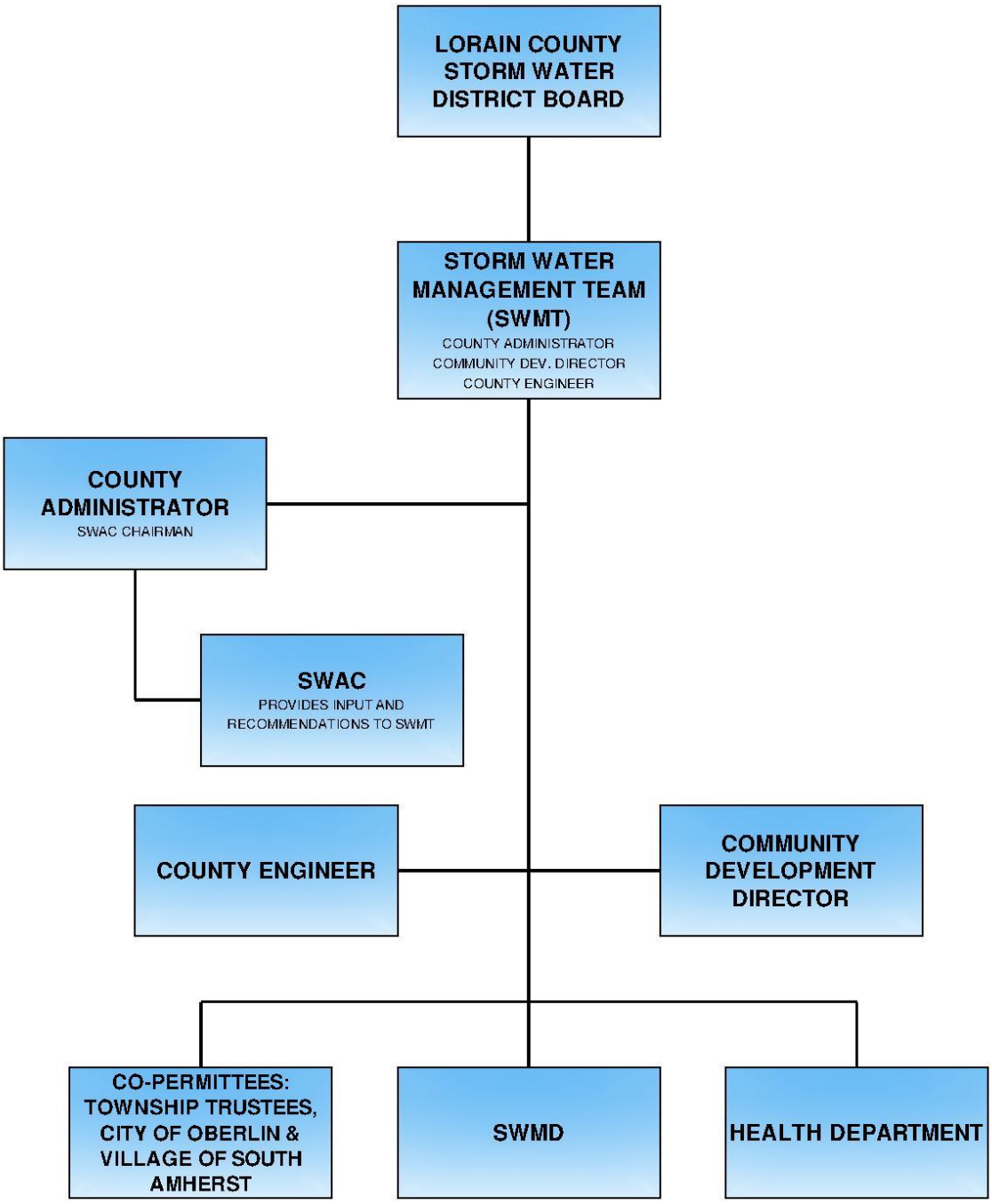

Figure 2 - Organizational Chart

The following list contains contact information for the entities shown on the Organizational Chart and the responsible party listed for BMP implementation in Section 4.

Lorain County Storm Water District Board
County Administration Building
226 Middle Avenue, Fourth Floor
Elyria, Oh 44035
P 440.329.5111
F 440.323.3357

Lorain County Administrator
J.R. White
County Administrator
County Administration Building
226 Middle Avenue, Fourth Floor
Elyria, Oh 44035
P 440.329.5750

Lorain County Community Development
Robert Duncan
Director
County Administration Building
226 Middle Avenue, Fifth Floor
Elyria, Ohio 44035
P 440.328.2323
F 440.328.2349

Lorain County Engineer
Ken Carney, P.E., P.S.
County Engineer
247 Hadaway St.
Elyria, Oh 44035
P 440.329.5586
F 440.329.5587

SWAC
J.R. White
County Administrator
County Administration Building
226 Middle Avenue, Fourth Floor
Elyria, Oh 44035
P 440.329.5750

Solid Waste Management District
Dave Blevins
Executive Director
County Administration Building
226 Middle Avenue, Fifth Floor
Elyria Oh 44035
P 440.329.5440
F 440.329.5777

Lorain County Public Health
Mark Adams, MPH, REHS
Health Commissioner
9880 Murray Ridge Road
Elyria, Oh 44035
P 440.322.6367
F 440.322.0911

Amherst Township
Kevin Smarsh
Road Superintendent
Amherst Township Hall
7530 Oberlin Road
Elyria, Oh 44035
P 440.988.5894
F440.988.5877

Carlisle Township
Paul Sniezek
Road Superintendent
Carlisle Township Hall
11969 LaGrange Road
LaGrange, Oh 44050
P 440.458.6688
F 440.458.4498

Columbia Township
Robert Rundle
Road Superintendent
Columbia Township Hall
25496 Royalton Road
P.O. Box 819
Columbia Station, Oh 44028
P 440.236.8802
F 440.236.8801

Eaton Township
Richard Kenchtges
Administrative Assistant Stm. Wtr. Mgt.
Eaton Township Hall
12043 Avon Belden Road
Grafton, Oh 44044
P 440.748.2236
F 440.748.1928

City of Oberlin
Jeff Baumann
Public Works Director
Oberlin City Hall
85 South Main Street
Oberlin, Oh 44074
P 440.775.1531
F 440.775.7208

Elyria Township
Jeff Bowers
Road Superintendent
Elyria Township Hall
41416 Griswald Road
Elyria, Oh 44035
P 440.324.3517
F 440.324.2109

Grafton Township
Carl Wesemeyer
Township Trustee
Grafton Township Hall
17109 Avon Belden Rd.
Grafton, Oh 44044
P 440.926.2166
F 440.926.8301

Henrietta Township
Joseph Siekeres
12050 Vermilion Rd.
Amherst, Ohio 44001
440-965-4214

Sheffield Township
David Underwood
Road Superintendent
Sheffield Township Hall
5166 Clinton Ave.
Lorain, Oh 44055
P 440.277.4215
F 440.277.1392

Village of South Amherst
Dave Leshinski
Mayor
Village Town Hall
103 W. Main Street
South Amherst, Oh 44001
P 440.986.8221
F 440.986.2270

3. TOTAL MAXIMUM DAILY LOAD (TMDL)

The renewal to the NPDES permit issued on April 1, 2021 (OHQ000004) states that "The BMPs that you or another entity will or already implements for each of the storm water minimum control measures. Where applicable, BMPs shall be selected to address U.S. EPA approved TMDL recommendations for identified water quality problems associated with MS4 discharges within your small MS4's watershed(s)." This SWMP will provide rationale for how and why each of the BMP's and measurable goals were elected for each of the Minimum Control Measures discussed in Section 4, and how this relates to applicable TMDL recommendations and/or the 2012 Great Lakes Water Quality Agreement Annex 4 (Nutrients). Figure 3 table taken from the OEPA NPDES Permit No.: OHQ000004 Appendix A shows what TMDL's have been approved within the communities that are covered under this SWMP. These are the TMDL's that will be considered when recommending BMP's.

COUNTY	REGULATED MS4	TMDL PROJECT	TMDL POLLUTANT(S)
Lorain	Carlisle Township	Black River	TP, Nitrate, TSS
Lorain	Elyria City	Black River	TP, Nitrate, TSS
Lorain	Elyria Township	Black River	TP, Nitrate, TSS
Lorain	Grafton Village	Black River	TP
Lorain	Lorain County	Black River	TP, Nitrate, TSS
Lorain	Lorain County	Rocky River	TP, Nitrogen
Lorain	North Ridgeville City	Black River	TP
Lorain	Oberlin City	Black River	TP, Nitrate, TSS

Figure 3 – Table of Regulated Communities located in the USEPA TMDL watershed from the OEPA NPDES Permit No.: OHQ000004 Appendix A

4. NPDES MS4 GENERAL PERMIT COMPLIANCE

Each of the MCM's is described below by first explaining the Permit Requirement/Performance Standards. Followed by the Decision Process and the BMP's selected. The Permit Requirement/ Performance Standards describe the requirements of the permit. *Italicized text* indicates text that comes directly from the permit. The Decision Process contains the information specifically required by the permit. The ***bold/italicized text*** indicates required items that must be specifically addressed in the SWMP and are directly from the permit. The BMP's section will explain which BMP's are to be used to comply with the permit, whether the SWD has legal authority to implement that BMP, the measurable goal(s) for the BMP, rationale for the BMP and the responsible party.

4.1. MCM#1 - Public Education and Outreach on Storm Water Impacts

4.1.1. Permit Requirement/Performance Standards

Permit Requirement: *You shall implement a public education program to distribute educational materials to the community or conduct equivalent outreach activities about the impacts of storm water discharges on water bodies and the steps that the public can take to reduce pollutants in storm water runoff.*

Performance Standards: *Your storm water public education and outreach program shall include more than one mechanism and target at least five different storm water themes or messages over the permit term. At a minimum, at least one theme or message shall be targeted to the development community. If your small MS4 discharges to a watershed with a U.S. EPA approved TMDL, your storm water public education and outreach program shall, at a minimum, target each TMDL pollutant identified for your small MS4 at least once to satisfy your minimum of five storm water themes or messages over the permit term. Single themes or messages may target multiple pollutants. Your storm water public education and outreach program shall reach at least 50 percent of your population over the permit term.*

4.1.2. Decision Process

1. ***How you plan to inform individuals and households about the steps they can take to reduce storm water pollution.***

Information will be disseminated to individuals and households through a variety of measures. During this permit term, the SWD plans to set a theme each year and send brochures to households that provide information on storm water pollution based on the yearly theme. The yearly themes were developed and are to be implemented through the Public Information and Public Education (PIPE) work group made up of a consortium of conservation organizations and local government agencies that the SWD is currently part of. The yearly themes along with what type of storm water pollution will be the focus of the theme are as follows:

2021: Lake Erie Starts Here/HOA BMP Maintenance (trying to get signed long-term maintenance plans)
2022: Landscaping/Native Plants etc. to go along with the new calendars

2023: Contractor/Developer Outreach
2024: Rainwater Harvesting (rain gardens, rain barrels)
2025: Litter/Car Maintenance

Along with brochures that are to be sent to households, other means of delivering information on the yearly themes to the public will be used such as webpages, newsletters, TV spot, radio ads, etc. The Public is also welcome and encouraged to attend LCPIPE meetings and provide input. The SWD has developed a comprehensive website to bring all storm water district information to a central location. The SWD has developed a number of brochures that are available on the SWCD website and which will be available at various public locations. Additionally, the County Engineer provides a number of outreach events each year including a booth at the County fair. Brochures are available at these events as well.

2. How you plan to inform individuals and groups on how to become involved in the storm water program (with activities such as local stream and beach restoration activities).

The SWD plans to post involvement opportunities on the Storm Water District Website and announce these opportunities at public meetings such as Board of Commissioner and LCPIPE meetings. Board of Commissioner meetings are generally covered by the media which will allow announcements to be broadcast in the newspaper and/or local radio. Townships will be required to announce upcoming activities at public township meetings as well.

3. Who are the target audiences for your education program who are likely to have significant storm water impacts (including commercial, industrial and institutional entities) and why those target audiences were selected.

Some of the target audiences that are likely to have significant storm water impacts include developers, contractors, and homeowners due to the fact that much of the unincorporated urbanized area is either developed for residential use or being developed for residential use. BMP's have been tailored in large part to reach and teach these target audiences.

4. What are the target pollutant sources your public education program is designed to address.

- Sediment
- Lawn Fertilizers
- Pesticides
- Pet Waste
- Oils
- Metals
- Grease
- Sewage
- Paint
- Hazardous Waste
- Organic Material
- Nutrients

These target pollutant sources include those that contribute to the TMDL's that have been approved in the MS4 communities as shown in Figure 3 – Table of Regulated Communities located in the USEPA TMDL watershed from the OEPA NPDES Permit Appendix A. The TMDL's that have been approved within the MS4 communities covered by this SWMP are as follows:

- Nutrients – Phosphorus and Nitrogen
- Sediment / Total Suspended Solids (TSS)
- Dissolved Oxygen (DO) and Organic Enrichment (OE)

5. ***What is your outreach strategy, including the mechanisms (e.g., printed brochures, newspapers, media, workshops, etc.) you will use to reach your target audiences, and how many people do you expect to reach by your outreach strategy over the permit term.***

Under the current permit, the SWD is required to develop a public education program that uses more than one mechanism and includes at least five different themes. In order to meet this requirement, the SWD has or plans to develop various BMP's which include more than 1 mechanism and at least 5 different themes. The SWD has worked with LCPIPE to develop 5 yearly themes that are to be used throughout the permit term. These themes have been discussed previously in this SWMP. The SWD will work with LCPIPE to continue efforts to further develop the Public Education Plan which will include multiple mechanisms such as website, brochures, banners, and workshops. Previous themes include:

- "Honey I Shrunk the Lawn!"
- Lake Erie (or Ohio River) Starts Here
- Waste
- On the Road to Clean Water
- Runoff Reduction
- Storm Water District Awareness
- Construction Erosion Control
- Post Construction Water Quality
- Pet Waste
- "Steer Clear of Pollutants"
- "What is a Watershed"
- Storm Water Quantity reduction
- "Clean Storm Water Starts at Home"
- "It's not hard to have a Healthy Yard"
- Rain Barrels

Brochures and information that have been previously developed and used may still be available at various public locations such as the County Fair.

The public education and outreach program for the SWD is setup to reach at least 50% of the population within the unincorporated urbanized areas, Village of South Amherst, and City of Oberlin Urbanized areas. Population estimates from the 2010 census indicate a population of 28,289. So the public education program would anticipate reaching a minimum of 14,145. Based on the average 2.51 people per household, as previously mentioned, the minimum number of households that would be needed to reach would be 5,636.

6. ***Who (person or department) is responsible for overall management and implementation of your storm water public education and outreach program and, if different, who is responsible for each of the BMPs identified for this program.***

The Storm Water Management Team is responsible for the overall management and implementation of the storm water public education and outreach program. The storm water management team will work with LCPIPE to continue to develop additional public education opportunities. The responsible party for each of the BMP's is listed with the BMP in section 4.1.3.

7. How will you evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

The public education and outreach program has goals set by the permit that require at least 50% of the population within the permit area be reached by the program. Measurable goals for each of the BMP's have been outlined which provide a framework to ensure that permit requirements are met. The program including each BMP will be evaluated annually to determine if the program is on track to meet the requirements of the permit.

4.1.3. MCM #1 - Public Education and Outreach BMP's

BMP Description:	LCPIPE Public Education Plan	**BMP #**	MCM1-01
Responsible Party:	SWMT working with LCPIPE	**Legal Authority:**	Y
Measurable Goals:	The SWD will work with LCPIPE to develop a yearly public education plan that includes the development of at least one theme for each year with more than one mechanism for education of that theme. The plan will ensure the information reaches at least 50% of the population over the permit term.		
Yearly Themes:	2021: Lake Erie Starts Here/HOA BMP Maintenance (trying to get signed long-term maintenance plans) 2022: Landscaping/Native Plants etc. to go along with the new calendars 2023: Contractor /Developer Outreach 2024: Rainwater Harvesting (rain gardens, rain barrels) 2025: Litter/Car Maintenance		
Rationale:	LCPIPE brings together various stakeholders within the community united around the purpose of public education, outreach and involvement. By working with LCPIPE, the SWD can target a larger community. The educational information developed will bring awareness to the general public regarding storm water quantity and quality concerns that need to be addressed, specifically the approved TMDL's within Lorain County.		
Method:	The public education plan is developed to target a yearly theme. The SWD will assist in the development of the plan and is spreading the message.		
Target Audience:	General Public, Commercial, Developers, Contractors, Institutional and Designers		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by LCPIPE.		
TMDL's Targeted:	All TMDL's approved within the MS4 communities are to be address by LCPIPE within the permit term. However, each theme will address the following TMDL's potentially more than others: 2021: Sediment/TSS, Nutrients, DO/OE 2022: Sediment/TSS, Nutrients, Nitrate, DO/OE 2023: Sediment/TSS, Nutrients 2024: Sediment/TSS, Nutrients 2025: Sediment/TSS, Nutrients, DO/OE, hydrocarbons, Metals		

BMP Description:	Storm Water District Website	**BMP #**	MCM1-02
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	Provide storm water pollution information on the website such as brochures, newsletters, etc. Also provide information on workshops and events that are open to the public.		
Rationale:	A website provides a quick and efficient way to disseminate information to the general public, developers, designers, contractors and County staff.		
Method:	Multiple pieces of education information are available on the web site as well as information on workshops / events that are open to the public.		
Target Audience:	General Public, Commercial, Developers, Contractors, Institutional and Designers		
Target Pollutants:	All pollutants targeted by the permit are expected to be targeted with the website in some form.		
TMDL's Targeted:	All TMDL's approved within the MS4 communities are expected to be targeted with the website in some form.		

BMP Description:	Erosion Control BMP Fact Sheets	**BMP #**	MCM1-03
Responsible Party:	Community Development	**Legal Authority:**	Y
Measurable Goals:	Factsheets have already been created. Factsheet distribution will be tracked with numbers provided to the Ohio EPA in the annual report.		
Rationale:	Erosion and Sediment control during construction is an important aspect to consider for developing counties. The factsheets explain how water quality can be improved while complying with the erosion control regulations established by the County.		
Method:	Printed factsheets will be available at SWCD, County Engineer's Office and Township Halls. Additionally, factsheets will be made available for download from the website.		
Target Audience:	Developers, Contractors and Designers		
Target Pollutants:	Sediment, Construction Pollutants		
TMDL's Targeted:	Phosphorus & Nitrogen, Sediment / TSS, DO/OE		

BMP Description:	Post Construction Storm Water Management Fact Sheets	**BMP #**	MCM1-04
Responsible Party:	Community Development	**Legal Authority:**	Y
Measurable Goals:	Factsheets have already been created. Factsheet distribution will be tracked with numbers provided to the Ohio EPA in the annual report.		
Rationale:	Post Construction Water Quality is an important aspect to consider for developing counties. The factsheets will explain how water quality can be improved while complying with the post construction regulations established by the County.		
Method:	Printed factsheets will be available at SWCD, County Engineer's Office and Township Halls. Additionally, factsheets will be made available for download from the website.		
Target Audience:	Developers, Contractors and Designers		
Target Pollutants:	Sediment		
TMDL's Targeted:	Sediment / TSS, DO/OE		

BMP Description:	Storm Water Quality Banners	**BMP #**	MCM1-05
Responsible Party:	Community Development	**Legal Authority:**	Y
Measurable Goals:	Banners have already been created for this BMP. Number of persons attending public meetings where the banners are displayed will be tracked with numbers provided to the Ohio EPA in the annual report.		
Rationale:	Banners provide an efficient way to quickly provide information to the general public. Banners will be posted at various public meetings to remind attendees of the importance of water quality and provide information on steps that can be taken to improve water quality. Banners have been created with titles such as: "Steer Clear of Pollutants" and "Clean Storm Water Starts At Home"		
Method:	Lorain County SWCD has created banners outlining various storm water impacts with information on improving water quality. These banners are made available to the Townships and other public entities to post during public meetings.		
Target Audience:	General Public, Contractors, Developers, Engineers, Architects, Landscapers, etc.		
Target Pollutants:	Oil, Antifreeze, car wash soap, fertilizer, pesticides, grass clippings, leaves and pet waste		
TMDL's Targeted:	Storm Water Quality Banners are expected to address all approved TMDL's within the MS4 Communities as one or more of the target pollutants contributes to all of them.		

BMP Description:	Storm Water Quality Informational Webinar/Workshops	**BMP #**	MCM1-06
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	Promotion of webinars and workshops has been implemented.		
Rationale:	EPA has developed a series of webinars providing education and training on improving water quality. The SWD believes that these webinars along with webinars and workshops put on by other entities can be an excellent source for low cost educational opportunities.		
Method:	Webinars and workshops will be promoted on the website, sent out to the storm water district's email list, through mass mailing to the townships and via the email list for Lorain County Community Alliance.		
Target Audience:	General Public, Contractors, Developers, Engineers, Architects, Landscapers, County and Township employees.		
Target Pollutants:	Sediment, Gas, Oil, Grease		
TMDL's Targeted:	Sediment / TSS, DO/OE, Bacteria		

BMP Description:	Recycling Educational Lending Library Program	**BMP #**	MCM1-07
Responsible Party:	SWMD	**Legal Authority:**	Y
Measurable Goals:	The Lending Library program has been setup and is currently online for use by the public. The number of educational items borrowed will be tracked and reported on the annual reports		
Rationale:	The online recycling educational lending library provides easy access for parents and school teachers to provide educational materials to their children.		
Method:	The lending library is an online library with a combination of books and videos promoting and educating on various recycling themes. The library contains a collection of 17 books and 30 videos for students in K-12.		
Target Audience:	K-12 Students		
Target Pollutants:	Litter, pollution		
TMDL's Targeted:	The Lending Library is expected to address all approved TMDL's within the MS4 Communities as one or more of the target pollutants contributes to all of them.		

BMP Description:	Booth at the County Fair	**BMP #**	MCM1-08
Responsible Party:	SWMD	**Legal Authority:**	Y
Measurable Goals:	Have a dedicated, staffed booth at the County Fair to disseminate NPDES related information.		
Rationale:	Residence attending the County Fair will be provided NPDES related information and learn of opportunities to get involved with the program.		
Method:	SWMD staff and booth dedicated to stormwater related issues.		
Target Audience:	General Public, Businesses and Organizations		
Target Pollutants:	All pollutants targeted by the permit are expected to be targeted by the County Fair Booth.		
TMDL's Targeted:	All approved TMDLs are expected to be targeted by the County Fair Booth.		

4.2. MCM #2 - Public Participation and Involvement

4.2.1. Permit Requirement/Performance Standards

Permit Requirement: *You shall comply with State and local public notice requirements and satisfy this minimum control measure's minimum performance standards when implementing a public involvement/participation program.*

Performance Standards: *Your storm water public involvement/participation program shall include, at a minimum, five public involvement activities over the permit term. If your small MS4 discharges to a watershed with a USEPA approved TMDL, your storm water public involvement/participation program shall, at a minimum, target each TMDL pollutant identified for your small MS4 at least once to satisfy your minimum of five public involvement activities over the permit term. Single public involvement activities may target multiple pollutants.*

4.2.2. Decision Process

1. ***Have you involved the public in the development and submittal of your NOI and SWMP description.***

The SWMP was updated by a team of consultants in consultation with County Staff. A draft SWMP was created and reviewed with the SWAC during a normal SWAC meeting. The SWAC was then given a one month review period and it was requested that comments be provided to the team at the following SWAC meeting. During the review period, SWAC members were encouraged to share the draft SWMP with members of their respective communities and peer groups. All meetings were open to the public and opportunity was given for the public to provide input at each meeting.

2. ***What is your plan to actively involve the public in the development and implementation of your program.***

The SWD has created a Storm Water Advisory Committee comprised of members of the community to be actively involved with the storm water district. The SWAC is comprised of the following members:

- County Administrator
- County Engineer
- Chief Deputy Engineer
- Assistant Lorain County Prosecutor
- Soil and Water Conservation District Board Member
- Township Trustee Board Representative
- City of Oberlin Representative
- Business Owner
- Farm Bureau Board Representative
- Developer
- Environmentalist
- Watershed Coordinator
- Secretary

The SWAC meets a minimum of once per quarter to educate members on District activities and allow input as the program was implemented. SWAC meetings are open to the public and follow local public notice requirements.

The SWD is also involved with Lorain County PIPE, an organization made up of a consortium of public and private entities with the purpose of providing increased public awareness relating to storm water issues. The SWD and LCPIPE plan to work together to develop public involvement opportunities each year in conjunction with the yearly public education plan.

3. Who are the target audiences for your public involvement program, including a description of the types of ethnic and economic groups engaged. You are encouraged to actively involve all potentially affected stakeholder groups, including commercial and industrial businesses, trade associations, environmental groups, homeowners associations, and educational organizations, among others.

Target audiences for the public involvement program include the general public, business owners, developers, contractors, environmentalists, designers and government employees. All ethnic and economic groups can be engaged by the program as a number of free public meetings and events are held throughout each year.

4. What are the types of public involvement activities included in your program. Where appropriate, consider the following types of public involvement activities: citizen representatives on a storm water management panel, public hearings, working with citizen volunteers willing to educate others about the program, volunteer monitoring or stream/beach clean-up activities.

Public Involvement activities for the Storm Water District include:

- Storm Water Advisory Committee (SWAC)
- Lorain County Public Involvement and Public Education (LCPIPE) Work Group
- Solid and Hazardous Waste Disposal
- Lorain County Pride Day
- Lorain County Adopt a Highway Program
- Fair Booth

The SWD will also work with LCPIPE to develop a yearly plan to provide additional public involvement activities.

5. Who (person or department) is responsible for the overall management and implementation of your storm water public involvement/participation program and, if different, who is responsible for each of the BMPs identified for this program.

The Storm Water Management Team as outlined in the organizational chart is responsible for the overall management and implementation of the Public Involvement/Participation program. Responsible party for each of the BMP's is listed in Section 4.2.3.

6. How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

The public participation and involvement program has goals set by the permit that require at least 5 public involvement activities over the permit term. Measurable goals for each of the BMP's have been outlined which provide a framework to ensure that permit requirements are met. The program including each BMP will be evaluated annually to determine if the program is on track to meet the requirements of the permit.

4.2.3. MCM #2 - Public Participation and Involvement BMP's

BMP Description:	Storm Water Advisory Committee (SWAC)	**BMP #**	MCM2-01
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	The SWAC was created in early 2010 and meets a minimum once per quarter. Attendance will be kept at SWAC meetings and provided to Ohio EPA with the annual report.		
Rationale:	The SWAC is comprised of various stakeholders from the community to keep them informed and provide input to the Storm Water District. Committee members are then able to report back to their respective stakeholder groups on current progress and issues involved with running the storm water district and staying in compliance with the NPDES requirements.		
Method:	The SWAC will meet a minimum of 4 times per year to educate the SWAC.		
Target Audience:	General Public, stakeholders		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed at some point during SWAC meetings.		
TMDL's Targeted:	All approved TMDL's will be discussed at some point during SWAC meetings.		

BMP Description:	Lorain County (LCPIPE)	**BMP #**	MCM2-02
Responsible Party:	SWMT working with LCPIPE	**Legal Authority:**	Y
Measurable Goals:	LCPIPE has already been created. LCPIPE meets every month and attendance at LCPIPE Events will be tracked and provided to Ohio EPA with the annual report		
Rationale:	LCPIPE meets every month to discuss storm water quality impacts. This meeting is open to the public and provides a medium for County residents and business to provide input into Storm Water Quality impacts that affect them as well as learn about what they can do to improve the quality of streams and lakes.		
Method:	Public meetings/activities will be held quarterly. As part of these meetings, the SWD will work with LCPIPE to develop a yearly plan to provide additional public involvement activities.		
Target Audience:	General Public, Contractors, Engineers, Architects, Landscapers, County Employees, Township Employees, City and Village Employees.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by LCPIPE.		
TMDL's Targeted:	Storm water quality impacts discussed at LCPIPE meetings may include ways to address the approved TMDL's		

BMP Description:	Solid and Hazardous Waste Disposal	**BMP #**	MCM2-03
Responsible Party:	SWMD	**Legal Authority:**	Y
Measurable Goals:	Lorain County has a collections center that is currently open 3 days a week.		
Rationale:	There is an extensive amount of solid and hazardous waste generated by the general public. The collection center provides a way to dispose of this waste in a legal and conscientious manner.		
Method:	A collection center has been set up to receive waste throughout the year. It is open to the public 3 days a week. The collection center will accept household hazardous waste, E-scrap, Fluorescent lamps and ballasts and scrap tires.		
Target Audience:	General Public, Businesses and Organizations		
Target Pollutants:	Trash, Metals and other general pollutants due to improper disposal		
TMDL's Targeted:	TSS		

BMP Description:	Lorain County Pride Day	**BMP #**	MCM2-04
Responsible Party:	SWMD	**Legal Authority:**	Y
Measurable Goals:	# of volunteers		
Rationale:	"Pride Day is a County-wide event and a chance to take pride in your community. Businesses looking to relocate choose clean well kept communities not littered neglected ones. Statistics have also proven less crime takes place in clean, well kept communities as opposed to neglected ones." When litter is picked up and areas are cleaned, storm water quality also benefits.		
Method:	"Lorain County Pride Day is a day set aside to clean up and beautify Lorain County. Volunteers spend the morning picking up litter in parks and along roadways. Playground equipment and fences are painted, gardens are weeded, planted and mulched and sidewalks are swept."		
Target Audience:	General Public, Businesses and Organizations		
Target Pollutants:	Trash, Metals and other general pollutants due to improper disposal		
TMDL's Targeted:	TSS		

BMP Description:	Booth at the County Fair	**BMP #**	MCM2-05
Responsible Party:	SWMD	**Legal Authority:**	Y
Measurable Goals:	Have a dedicated, staffed booth at the County Fair to disseminate NPDES related information.		
Rationale:	Residence attending the County Fair will be provided NPDES related information and learn of opportunities to get involved with the program.		
Method:	SWMD staff and booth dedicated to stormwater related issues.		
Target Audience:	General Public, Businesses and Organizations		
Target Pollutants:	All pollutants targeted by the permit are expected to be targeted by the County Fair Booth.		
TMDL's Targeted:	All approved TMDLs are expected to be targeted by the County Fair Booth.		

4.3. MCM #3 - Illicit Discharge Detection and Elimination (IDDE)

4.3.1. Permit Requirement/Performance Standards

Permit Requirement: *You shall develop, implement and enforce a program to detect and eliminate illicit discharges, as defined in Part VI of this permit, into your small MS4 (for illicit discharges to your MS4 via an adjacent, outside of your jurisdiction, interconnected MS4, you are only required to inform the neighboring MS4 and Ohio EPA in your annual report submission, of their existence);*

You shall develop, if not already completed, a comprehensive storm sewer system map, showing the location of all outfalls and the names and location of all surface waters of the state that receive discharges from those outfalls. Your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post-construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements. Post-construction BMPs shall be identified by type of practice (e.g., wet extended detection basin, bioretention, etc.). Previously existing post construction BMPs shall be identified by type of practice within five (5) years of the effective date of this permit.

Within five years of when your initial Small MS4 general permit coverage was granted, you shall submit the following to Ohio EPA:

A list of all on-site sewage disposal systems connected to discharge to your MS4 (a.k.a., home sewage treatment systems (HSTSs)) including the addresses; and

A storm sewer map showing the location of all HSTSs connected to your MS4. This map shall include details on the type and size of conduits/ditches in your MS4 that receive discharges from HSTSs, as well as the water bodies receiving the discharges from your MS4.

You shall to the extent allowable under State or local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions;

You shall develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to your system. At a minimum, for household sewage treatment systems (HSTSs), your plan shall address or include provisions for:

Working with the appropriate Board(s) of County Commissioners, other public officials, local wastewater authorities, any other appropriate entity and local board(s) of health to proactively identify residences with existing individual discharging HSTSs that can be legally, feasibly and economically connected to central sewers. At a minimum, the plan shall evaluate applying provisions identified by ORC 6117.51 and other applicable State and local laws and/or regulations. At a minimum, this activity should require connection to central sewers for any discharging HSTS that is not operating as designed and intended if feasible, but it does not preclude connection to central sewers of any HSTS if local planning and coordination recommends such;

Working with local board(s) of health to develop a proactive operation and maintenance program or implement/enhance an existing operation and maintenance program which determines if existing discharging HSTSs are operating as designed and intended and, for those not meeting these criteria, requires elimination, upgrade or replacement of the systems as appropriate;

Actively investigating the source(s) of contamination in outfalls identified during dry weather screening process. When the contamination source has been identified as discharging HSTS that is not operating as designed and intended, work with the local board(s) of health to determine proper course of action in resolving the non-functioning HSTS with connection to central sewers being preferred alternative, followed by replacing system with a soil absorption system that does not discharge and only allowing a replacement discharging HSTS when no other option is available. For HSTS discharges that cannot be eliminated through connection to central sewers or installation of soil absorption systems, the property owner must be notified of the requirement to pursue coverage under an appropriate Ohio EPA general NPDES permit; and

Working with local wastewater authorities, planning agencies or other appropriate agencies involved to evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTSs.

You shall inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste.

You shall address the following categories of non-storm water discharges or flows (i.e., illicit discharges) only if you or Ohio EPA has identified them as significant contributors of pollutants to your small MS4: water line flushing, landscape irrigation, diverted stream flows, rising ground waters, uncontaminated ground water infiltration (as defined at 40 CFR §35.2005(20)), uncontaminated pumped ground water, discharges from potable water sources, foundation

drains, air conditioning condensation, irrigation water, springs, water from crawl space pumps, footing drains, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, dechlorinated swimming pool discharges, street wash water, and discharges or flows from fire-fighting activities (by definition, not an illicit discharge).

You may also develop a list of other similar occasional incidental non-storm water discharges (e.g., non-commercial or charity car washes, etc.) that will not be addressed as illicit discharges. These non-storm water discharges must not be reasonably expected (based on information available to the permittees) to be significant sources of pollutants to the MS4, because of either the nature of the discharges or conditions you have established for allowing these discharges to your MS4 (e.g., a charity car wash with appropriate controls on frequency, proximity to sensitive water bodies, BMPs on the wash water, etc.). You must document in your SWMP any local controls or conditions placed on the discharges. You must include a provision prohibiting any individual non-storm water discharge that is determined to be contributing significant amounts of pollutants to your MS4.

Performance Standard: *Your storm water illicit discharge detection and elimination program shall include or have included an initial dry-weather screening of all your storm water outfalls over the permit term. Your program shall establish priorities and specific goals for long-term system- wide surveillance of your MS4, as well as for specific investigations of outfalls and their tributary area where previous surveillance demonstrates a high likelihood of illicit discharges. Data collected each year shall be evaluated and priorities and goals shall be revised annually based on this evaluation. Your comprehensive storm sewer system map shall be updated annually as needed.*

You shall notify Ohio EPA if any of the following Illicit discharges are detected discharging to your small MS4: Illicit sanitary cross connections from industrial, commercial or multi-family sources; and leaking or broken sanitary sewer lines that are actively contributing sewage to your small MS4. Notification shall include the location, general description, date, and approximate time the illicit discharge was discovered. Such notification shall be made to the appropriate Ohio EPA district office within twenty-four (24) hours of discovery of the source to the Northeast District Office: nedo24hournpdes@epa.ohio.gov

If your small MS4 discharges to a watershed with a U.S. EPA approved TMDL and any of the following pollutants are identified for your small MS4: Nutrients (Includes Phosphorus, Nitrogen and Ammonia); E. coli Bacteria; or Dissolved Oxygen and Organic Enrichment Your illicit discharge detection and elimination program shall include an annual employee training which includes illicit discharge detection and elimination topic(s).

4.3.2. Decision Process

1. ***How you will develop a comprehensive storm sewer map showing the location of all outfalls and the names and location of all receiving waters. Describe the sources of information you used for the maps, and how you plan to verify the outfall locations with field surveys. If already completed, describe how you developed this map. Also, describe how your map will be regularly updated.***

The SWD has developed current storm sewer maps for each of the MS4 communities listed as co-permittees which are included as Exhibit 6. The SWD has also consolidated Township and County maps into one map using the existing County GIS system. Sources for development of the comprehensive map included existing improvement plans and topography. Following creation of the map, site visits were made to verify the outfall locations. The SWD will evaluate the storm system map annually to determine if any changes have been made to the MS4, if so the storm system map will be updated accordingly. The City of Oberlin and Village of South Amherst have been added to the county map showing all outfalls and names and locations of receiving waters. The long-term goal is for the City of Oberlin and Village of South Amherst entire stormwater system to be added to the County and Township information so that all data is in one map using the existing County GIS system.

2. ***The mechanism (ordinance or other regulatory mechanism) you will use to effectively prohibit illicit discharges into the MS4 and why you chose that mechanism. If you need to develop this mechanism, describe your plan and a schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with your program.***

The SWD has passed a resolution which prohibits illicit discharges and illegal connections into the MS4 as well as a resolution approving a Memorandum of Understanding between the County and the MS4 Communities covered by this SWMP to detect and eliminate illicit discharges. These mechanisms allow the County and MS4 Communities to the extent allowed by law to prohibit illicit discharges and illegal connections, establish legal authority to carry out inspections, develop monitoring procedures and create enforcement actions as necessary. Copies of the Resolutions are attached as Exhibit 2 – Illicit Discharge Resolutions.

3. ***Your plan to detect and address illicit discharges to your system, including discharges from illegal dumping and spills. Your plan shall include dry weather field screening for non-storm water flows and Ohio EPA recommends field tests of selected chemical parameters as indicators of discharge sources. You shall describe the mechanisms and strategies you will implement to ensure outfalls which have previously been dry-weather screened will not have future illicit connections. Your plan shall also address on-site sewage disposal systems (including failing on-lot HSTSs and off-lot discharging HSTSs) that flow into your storm drainage system. Your description shall address the following, at a minimum:***

    a. ***Procedures for locating priority areas which include areas with higher likelihood of illicit connections (e.g., areas with older sanitary sewer lines, for example) or ambient sampling to locate impacted reaches;***

SWD staff will perform a review of potential “hot spots” on an annual basis within the urbanized areas of the County and the Co-permitted Municipalities. Potential hot spots include areas with dated sanitary sewer lines, locations where complaints are common, locations with previously documented illicit discharges and locations where dry weather screenings indicate problem

areas. The review will be conducted to determine which areas to target with further sampling and inspections.

b. Procedures for tracing the source of an illicit discharge, including the specific techniques you will use to detect the location of the source;

The SWD personnel has conducted initial dry weather screening of all MS4 outfalls within the unincorporated urbanized areas of the County and the Co-permitted Municipalities. Twenty (20) percent of these outfalls are to be re-screened on an annual basis which means that 100 percent of the outfalls will be re-screened within the permit term. Once screening has been performed, further inspection and sampling will be performed on those water bodies found to have evidence of illicit discharge. Techniques may include water quality sampling and testing, visual inspections of streams, sanitary sewers and manholes, smoke testing, dye testing and TV inspection of sanitary sewers.

c. Procedures for removing the source of the illicit discharge; and

Procedures for removing the source of an illicit discharge are outlined in Item 3 above. These procedures include sending a notice of violation, providing an administrative hearing and injunctive relief. In addition to these forms of enforcement if the responsible party is unwilling or unable to remove the source of the illicit discharge assistance may be requested from Ohio EPA. Depending on the type of the Illicit Discharge the responsible party will be given opportunity to work with the Lorain County Health Department and/or the Lorain County Engineer's Office to determine the best solution for elimination of the Illicit Discharge.

d. Procedures for program evaluation and assessment.

Procedures for program evaluation and assessment include an annual review of the program to determine effectiveness. A series of questions will be answered in the annual review as follows (Questions come from the IDDE guidance manual prepared by the Cuyahoga County Board of Health):

To effectively evaluate your program, a number of questions need to be asked and analyzed.

1. Evaluate priority areas within your community:
    a. Were these areas identified initially?
    b. Are these areas still appropriate to be a priority area?
    c. Have illicit discharges been located in these areas?
2. Detection Program
    a. Is the program effective? Need to reassess the program by determining what has been achieved. Look at number of outfalls inventoried, the number visually inspected, the number that had dry weather flows and look at the overall percentages of these flows as part of your overall storm sewer system for your community.
    b. Cost effectiveness: What aspects of the program had the highest quality of effectiveness in relationship to cost?

c. Number of illicit discharges detected utilizing each detection method (will assist to see what method is more effective).

3. Tracing Program
   a. What techniques were used?
   b. Were these methods successful?
   c. What techniques that were not used would be beneficial for next year?
   d. How many illicit sources were identified and eliminated?
4. Other
   a. If using water quality sampling, resample areas within community to determine effectiveness of the removal of illicit discharges.
   b. Determine how much time was spent by employees and expenses to determine overall cost for achieving a given result.

4. Your plan to ensure through appropriate enforcement procedures and actions that your illicit discharge ordinance (or other regulatory mechanism) is implemented.

The County's enforcement procedures per are outlined as follows:

IX. ENFORCEMENT

A. Notice of violation. When the County finds that a person has violated a prohibition or failed to meet a requirement of this regulation, the County may order compliance by written Notice of Violation. Such notice must specify the violation and shall be hand delivered, and/or sent by registered mail, to the owner/operator of the facility. Such notice may require the following actions:

   1. The performance of monitoring, analyses, and reporting;
   2. The elimination of illicit discharges or illegal connections;
   3. That violating discharges, practices, or operations cease and desist;
   4. The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property; or
   5. The implementation of source control or treatment BMP's.

B. If abatement of a violation and/or restoration of affected property is required, the Notice of Violation shall set forth a deadline within which such remediation or restoration must be completed. Said Notice shall further advise that, should the facility owner/operator fail to remediate or restore within the established deadline, a legal action for enforcement may be initiated.

C. Any person receiving a Notice of Violation must meet compliance standards within the time established in the Notice of Violation.

D. Administrative Hearing: If the violation has not been corrected pursuant to the requirements set forth in the Notice of Violation, the County shall schedule an administrative hearing to determine reasons for non-compliance and to determine the next

enforcement activity. Notice of the administrative hearing shall be hand delivered and/or sent registered mail.

E. Administrative hearings shall be conducted by the Board of Commissioners, or by any officer or body designated by the Board of Commissioners by further resolution.

F. Injunctive Relief: It shall be unlawful for any owner/operator to violate any provision or fail to comply with any of the requirements of this regulation pursuant to O.R.C. 3709.211. If an owner/operator has violated or continues to violate the provisions of this regulation, the County may petition for a preliminary or permanent injunction restraining the owner/operator from activities that would create further violations or compelling the owner/operator to perform abatement or remediation of the violation.

5. How you plan to inform public employees, businesses, and the general public of hazards associated with illegal discharges and improper disposal of waste. Include in your description how this plan will coordinate with your public education minimum measure and your pollution prevention/good housekeeping minimum measure programs.

The Illicit Discharge Public Education Program will be developed in conjunction with MCM #1 Public Education and Outreach as well as MCM #6 Pollution Prevention and Good Housekeeping. As part of the Public Education and Outreach program, Storm Water Quality Banners have been developed for posting at public events, a website has been developed providing information and webinars and training sessions are advertised through Lorain County PIPE to bring awareness to Illicit Discharge and how to prevent it. An annual trading session will be held to specifically inform public employees and consultants how to detect and prevent illicit discharges.

6. Who is responsible for overall management and implementation of your storm water illicit discharge detection and elimination program and, if different, who is responsible for each of the BMPs identified for this program.

The Storm Water Management Team as outlined in the organizational chart is responsible for the overall management and implementation of the Public Involvement/Participation program. Responsible party for each of the BMP's is listed in Section 4.3.3.

7. How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

Success of this MCM will be evaluated by analyzing the number of Illicit Discharges detected and eliminated on an annual basis. Number of participants in the annual training on IDDE will be recorded. Measurable goals for each of the BMP's were selected based on the County's ability physically and financially to implement these BMP's.

4.3.3. MCM #3 - Illicit Discharge Detection and Elimination BMP's

BMP Description:	Storm Sewer System Map	**BMP #**	MCM3-01
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	Existing County and Township maps have been incorporated into one comprehensive map. The map is to be updated when changes (additions/alterations) in the system occur. The City of Oberlin and Village of South Amherst have been added to the county map showing all outfalls and names/locations of receiving waters. The complete stormwater sewer system for the City of Oberlin and Village of South Amherst are mapped in a CAD/PDF format. The long-term goal is for the City of Oberlin and Village of South Amherst entire stormwater system to be added to the County and Township information so that all data is in one map using the existing County GIS system.		
Rationale:	The storm sewer system map is required by Ohio EPA and provides an inventory of existing storm entities in the unincorporated urbanized areas of Lorain County.		
Method:	County maps are in an online GIS system and Township mapping were added to the comprehensive map. The outfalls and receiving waters within South Amherst Village and the City of Oberlin have been added to the county map and it is a long term goal to include then entire stormwater system in the one comprehensive map.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by the storm sewer mapping.		
TMDL's Targeted:	The comprehensive map will allow the storm sewer system to be managed more efficiently and allow for tracking of IDDE's which may contain pollutant contributing to TMDL's		

BMP Description:	HSTS Map and List (Exhibit 5)	**BMP #**	MCM3-02
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	A HSTS Map and List has been developed which shows all HSTS's in the County. The SWMT has also developed a list to show HSTS's that discharge to the MS4 within the urbanized areas. This map and list shall be updated as needed. A HSTS map and list have been developed for the City of Oberlin. A map and list of the Village of South Amherst will be created by the end of 2022.		
Rationale:	The HSTS Map and List provides the County, Townships and Municipalities with a list of all of the HSTS in the unincorporated urbanized areas of Lorain County. The map provides an overview of the existing HSTS's within the Urbanized Areas of the County. A map and list of the Village of South Amherst will be created by the end of 2022.		
Method:	The HSTS map was developed using the County GIS System.		
Target Pollutants:	Sewage and other residential waste are expected to be addressed by the mapping and listing of HSTSs in the county		
TMDL's Targeted:	Bacteria, TSS, Nutrients, DO/OE		

BMP Description:	IDDE Resolution	**BMP #**	MCM3-03
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	The IDDE Resolution has been implemented and is attached as Exhibit 2 – Illicit Discharge Resolutions.		
Rationale:	The resolution outlines ability and responsibility of the County and Townships to the extent allowed by law to prohibit illicit discharges and illegal connections, establish legal authority to carry out inspections, develop monitoring procedures and create enforcement actions as necessary.		
Method:	The resolution was passed by the Lorain County Board of Commissioners in accordance with the Ohio Revised Code		
Target Pollutants:	Tracing of IDDE's will allow for removal of all illicit discharges and should have a positive effect on reducing all pollutants targeted by the permit.		
TMDL's Targeted:	Tracing of IDDE's will allow for removal of all illicit discharges and should have a positive effect on reducing all of the pollutants leading to the approved TMDL's		

BMP Description:	IDDE Program	**BMP #**	MCM3-04
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	20% of outfalls are to be screened each year, which means 100% of outfalls are to be screened within the permit term.		
Rationale:	The IDDE program was created to provide a guidance manual for SWD personnel for detection and elimination of illicit discharges.		
Method:	IDDE program will be based on guidance provided by the Cuyahoga County Board of Health entitled "Illicit Discharge Detection and Elimination Manual" dated July 2006.		
Target Pollutants:	Tracing of IDDE's will allow for removal of all illicit discharges and should have a positive effect on reducing all pollutants targeted by the permit.		
TMDL's Targeted:	Tracing of IDDE's will allow for removal of all illicit discharges and should have a positive effect on reducing all of the pollutants leading to the approved TMDL's		

BMP Description:	Illicit Discharge Public Education Program	**BMP #**	MCM3-05
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	The SWD currently provides Illicit Discharge Public Education through MCM #1 by providing Water Quality Banners at public events as well as through the promotion of webinars and other training opportunities directed towards Illicit Discharge		
Rationale:	Public Education brings awareness and provides guidance to the General Public, as well as SWD Staff on how to detect and eliminate illicit discharges thereby improving the water quality of our streams and lakes		
Method:	The Illicit Discharge Public Education Program will be performed in conjunction with MCM #1 Public Education and Outreach		
Target Pollutants:	Education of IDDE's will allow for minimization of all illicit discharges and should have a positive effect on reducing all pollutants targeted by the permit.		
TMDL's Targeted:	Bacteria, TSS, Nutrients, DO/OE		

BMP Description:	Illicit Discharge Employee Training Program	**BMP #**	MCM3-06
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	The SWD will provide training on the topic of Illicit Discharge detection and elimination for public employees and consultants. Number of IDDE employee training attendees will be reported.		
Rationale:	Provide training for all employees and consultants involved in the IDDE program on how to detect and eliminate illicit discharges thereby improving the water quality of our streams and lakes.		
Method:	Provide annual training for all employees and consultants involved in the IDDE program on how to detect and eliminate illicit discharges.		
Target Pollutants:	Training of IDDE's will allow for minimization of all illicit discharges and should have a positive effect on reducing all pollutants targeted by the permit.		
TMDL's Targeted:	Bacteria, TSS, Nutrients, DO/OE		

BMP Description:	Post Construction Runoff Control BMP Map	**BMP #**	MCM3-07
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	Maps of the existing post construction runoff control BMPs have been created and the type of BMP will be added to all existing facilities over the 5 year permit term. The map is to be updated when changes (additions/alterations) in the system occur.		
Rationale:	The post construction runoff control BMP map is required by Ohio EPA and provides an inventory of existing post construction storm water management facilities in the unincorporated urbanized areas of Lorain County along with the co-permitted municipalities.		
Method:	Post construction runoff control BMP maps are developed in a GIS system. An attribute field will be added to the system to identify the type of stormwater management facility. All existing facilities will be identified by type as part of the annual inspection process over the permit term. All new facilities should be added as part of the pre-construction plan review, inspection and evaluation of active construction projects.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by the post construction runoff control BMP mapping.		
TMDL's Targeted:	The comprehensive map will allow the post construction runoff control BMP map to be managed more efficiently and allow for tracking of IDDE's or ineffective controls which may relate to all approved TMDL's		

4.4. MCM #4 - Construction Site Storm Water Runoff Control

4.4.1. Permit Requirement/Performance Standards

Permit Requirement: *You shall develop, implement, and enforce a program to reduce pollutants in any storm water runoff to your small MS4 from construction activities that result in a land disturbance of greater than or equal to one acre. Reduction of pollutants in storm water discharges from construction activity disturbing less than one acre shall be included in your program if that construction activity is part of a larger common plan of development or sale that would disturb one acre or more. If Ohio EPA waives requirements for storm water discharges associated with small construction from a specific site(s), you are not required to enforce your program to reduce pollutant discharges from such site(s). Your program shall include the development and implementation of, at a minimum:*

An ordinance or other regulatory mechanism to require erosion and sediment controls, and non-sediment pollutant controls, as well as sanctions to ensure compliance, to the extent allowable under State or local law.

Requirements for construction site operators to implement appropriate erosion and sediment control BMPs;

Requirements for construction site operators to control waste such as, but not limited to, discarded building materials, concrete truck washout, chemicals, litter, and sanitary waste at the construction site that may cause adverse impacts to water quality;

Procedures for storm water pollution prevention plan review which incorporate consideration of potential water quality impacts;

Procedures for receipt and consideration of information submitted by the public; and

Procedures for site inspection and enforcement of control measures.

Performance Standard: *Your ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in the Ohio EPA NPDES General Storm Water Permit for Construction Activities (OHC000005) applicable to your permit area. If you had coverage under the previous version of this permit (OHQ000003), you shall revise your ordinance or other regulatory mechanism, if needed, within one (1) year of the effective date of this permit.*

Your construction site storm water control program shall include pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre and from construction activities which are part of a larger common plan of development or sale that will disturb one acre or more. An objective tool such as software or checklist shall be used to document each SWP3 review. Documentation of any communications regarding review and plan revisions and any notification to obtain NPDES permit coverage shall be maintained.

To ensure compliance, all applicable sites shall have an initial inspection. Follow-up inspections shall be on a monthly basis (at least every 31 calendar days). An objective tool such as software

or checklist shall be used to document each site inspection to ensure all conditions of OHC000005 are addressed. These inspections are to be conducted by the MS4 or their contracted representative. They are in addition to the self-inspections required of construction site operators under OHC000005.

If your small MS4 discharges to a watershed with a U.S. EPA approved TMDL and any of the following pollutants are identified for your small MS4: Total Suspended Solids (Includes Sediment and Siltation); or Nutrients (Includes Phosphorus, Nitrogen and Ammonia) Your construction site storm water program shall include the following performance standard. At a minimum, applicable construction sites which have the following compliance issues shall be inspected once every 14 calendar days instead of on a monthly basis: Construction activities have started at the site with no SWP3 reviewed and approved by the MS4; Failure to install sediment basin(s) when the SWP3 and/or site drainage clearly indicate as a first step (within 7 days prior to grading and within 7 days of grubbing); Construction activities taking place with no sediment/erosion controls; or Dewatering activities resulting in turbid discharges. Your inspections can be returned to a monthly basis for the construction site once compliance with the above compliance issues have been addressed and verified.

4.4.2. Decision Process

1. The mechanism (ordinance or other regulatory mechanism) you will use to require erosion and sediment controls, and non-sediment pollution controls at construction sites and why you chose that mechanism. If you need to develop this mechanism, describe your plan and a schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with your SWMP description;

The SWD has passed resolutions which require erosion and sediment controls at construction sites. These resolutions adopt the Lorain County Erosion & Sediment Control Rules. The purpose of said rules is to establish technically feasible and economically reasonable standards to achieve a level of management and conservation practices in order to abate soil erosion and degradation of the waters of the State by soil sediment on land used or being developed for non-farm commercial, industrial, residential or other non-farm purposes, to establish criteria for determination of the acceptability of such management and conservation practices, and to implement Phase II of the storm water program of the National Pollutant Discharge Elimination System (NPDES) established in 40 CFR Part 122, and to promote the health, safety and well-being of the residents of Lorain County. Specifically, the Rules are intended to protect:

a) Adjacent landowners from property loss due to sedimentation, erosion and flooding.

b) County, township, Village of South Amherst and City of Oberlin ditches, culverts and storm sewers from loss of capacity due to siltation.

c) Water and habitat quality in streams and wetlands.

A copy of the County Resolutions and current rules are attached as Exhibit 3 – Erosion Control Resolutions and Rules.

A program has been developed to allow SWD personnel to perform inspections of active construction sites using a standard form to evaluate the sites compliance with the County Sediment and Erosion Control Rules along with the OEPA Construction General Permit OHC000005. Inspection will be conducted on a monthly basis with at least once every 31 calendar days with an escalation to one every 14 days for the following compliance issues: Construction activities have started at the site with no SWP3 reviewed and approved by the MS4; Failure to install sediment basin(s) when the SWP3 and/or site drainage clearly indicate as a first step (within 7 days prior to grading and within 7 days of grubbing); Construction activities taking place with no sediment/erosion controls; or Dewatering activities resulting in turbid discharges. Your inspections can be returned to a monthly basis for the construction site once compliance with the above compliance issues have been addressed and verified.

2. Your requirements for construction site operators to implement appropriate erosion and sediment control BMPs and control waste at construction sites that may cause adverse impacts to water quality. Such waste includes, but is not limited to, discarded building materials, concrete truck washouts, chemicals, litter, and sanitary waste;

The following section from the Lorain County Erosion & Sediment Control Rules outlines how waste at construction sites will be controlled:

"4.5 NON-SEDIMENT POLLUTANT CONTROLS: No solid or liquid waste, including building materials, shall be discharged in storm water runoff. The applicant must implement site best management practices to prevent toxic materials, hazardous materials, or other debris from entering water resources or wetlands. These practices shall include but are not limited to the following:

(a) Waste Materials: A covered dumpster shall be made available for the proper disposal of garbage, plaster, drywall, grout, gypsum, and other waste materials.

(b) Concrete Truck Wash Out: The washing of concrete material into a street, catch basin, or other public facility or natural resource is prohibited. A designated area for concrete washout shall be provided and clearly marked for usage.

(c) Fuel/Liquid Tank Storage: All fuel/liquid tanks and drums shall be stored in a marked storage area. A dike shall be constructed around this storage area with a minimum capacity equal to 110% of the volume of all containers in the storage area.

(d) Toxic or Hazardous Waste Disposal: Any toxic or hazardous waste shall be disposed of properly.

(e) Contaminated Soils Disposal and Runoff: Contaminated soils from redevelopment sites shall be disposed of properly. Runoff from contaminated soils shall not be discharged from the site. Proper permits shall be obtained for development projects on solid waste landfill sites or redevelopment sites.

(f) Restroom facilities must be provided for site workers during all phases of construction.

3. Your procedures for pre-construction storm water pollution prevention plan review which incorporate consideration of potential water quality impacts. Describe the estimated number and percentage of sites that will have pre-construction site plans reviewed;

Lorain County has prepared an ESC plan checklist that can be completed by both the designer and the reviewer. The checklist outlines the required items in the ESC plan. Requirements include water quality permit verification for wetlands, and water quality certification. ESC plan review is under the control of the SWD and may be contracted out to various entities. The following section from the Lorain County Erosion & Sediment Control Rules outlines application procedures for the ESC plan:

5. Application Procedures for ESC Plan

The ESC Plan for development projects shall be submitted to the Administrator after the approval of the preliminary plans and prior to the approval of improvement plans or drawings by the Lorain County Planning Commission in the case of subdivisions; concurrently with the submittal of construction drawings to the Lorain County Engineer or Township Zoning Inspector in the case of other construction projects; and thirty (30) working days prior to any soil-disturbing activity for general clearing projects.
The Administrator shall review the ESC plan and approve, or return for revision with comments and recommendations for revision, within Thirty (30) working days after receipt of said plan. A plan rejected because of deficiencies shall receive a narrative report stating specific problems and the procedure for filing a revised plan. At the time of receipt of a revised plan, another 30-day review period shall be commenced.

Approved plans shall remain valid for two years from the date of approval. A copy of the approved plan and its review report shall be forwarded by the Administrator to the Lorain Soil & Water Conservation District, County Planning Commission, and County Engineer.

4. Your procedures for receipt and consideration of information submitted by the public. Consider coordinating this requirement with your public education program;

The SWD has implemented a hotline to be used for storm water related inquiries, complaints or violation reporting. Information can be submitted to the SWMT through this hotline. The information will be recorded and reviewed. The SWMT will perform a site visit if necessary. If it is determined that there is a violation at the site, the SWMT will make a recommendation to the Board of County Commissioners to issue a stop work order.

5. Your procedures for site inspection and enforcement of control measures, including how you will prioritize sites for inspection;

The SWMT oversees plan review as well as inspection of control measures. The SWMT's goal is to ensure that personnel perform a site Inspection on a monthly basis with at least once every 31 calendar days with an escalation to one every 14 days for the following compliance issues: Construction activities have started at the site with no SWP3 reviewed and approved by the MS4; Failure to install sediment basin(s) when the SWP3 and/or site drainage clearly indicate as a first step (within 7 days prior to grading and within 7 days of grubbing); Construction

activities taking place with no sediment/erosion controls; or Dewatering activities resulting in turbid discharges. The inspections can be returned to a monthly basis for the construction site once compliance with the above compliance issues have been addressed and verified. If deficiencies are noted they will be provided to the site operator for correction. At the following site visit if deficiencies have still not been corrected, SWD personnel will make a recommendation to the Board of County Commissioners to issue a stop work order. Additional enforcement procedures are outlined above in item 4.4.3.2.

6. Your program to ensure compliance with your erosion and sediment control regulatory mechanism, including the sanctions and enforcement mechanisms you will use to ensure compliance. Include a written enforcement escalation plan describing your procedures for when you will use certain sanctions. Possible sanctions include non-monetary penalties (such as a stop work orders), fines, bonding requirements, and/or permit denials for non-compliance;

The following section from the Lorain County Erosion & Sediment Control Rules outlines the SWD plan to ensure compliance with regulatory mechanism in place for erosion and sediment control:

6. Monitoring for Compliance: Enforcement

6.1 Following the initial inspection of erosion and sediment control devices by the project engineer, regular inspections will be performed by the Administrator for compliance with these Rules. If it appears that a violation of any of these Rules has occurred, the owner and developer will be notified of deficiencies or noncompliance in writing by certified mail, return receipt requested.

6.2 The rules shall be enforced in accordance with O.R.C. 309.79 and at a minimum shall permit: The Board of County Commissioners or any duly authorized representative of the Board may, upon identification to the owner or person in charge, enter any land upon obtaining agreement with the owner, tenant, or manager of the land in order to determine whether there is compliance with the rules adopted under this section. If the Board or its duly authorized representative is unable to obtain such an agreement, the Board or representative may apply for, and a judge of the Lorain County Common Pleas Court inspection warrant as necessary to achieve the purposes of this chapter.

1. If the Board of County Commissioners or its duly authorized representative determines that a violation of the rules adopted under this section exists, the Board or representative may issue an immediate stop work order if the violator failed to obtain any federal, state or local permit necessary for sediment and erosion control, earth movement, clearing, or cut and fill activity. In addition, if the Board or representative determines such a rule violation exists, regardless of whether or not the violator has obtained the proper permits, the Board or representative may authorize the issuance of a notice of violation. If, after a period of not less than thirty – (30) days has elapsed following the issuance of the notice of violation, the violation continues, the Board or its duly authorized representative shall issue a second notice of violation. Except as provided in division Subsection (3) of this section, if after a period of not less than fifteen (15) days has elapsed following the issuance of the second notice of violation,

the violation continues, the Board or its duly authorized representative may issue a stop work order after first obtaining the written approval of the prosecuting attorney of the county if, in the opinion of the prosecuting attorney, the violation is egregious.

Once a stop work order is issued, the Board or duly authorized representative shall request, in writing, the prosecuting attorney of the county to seek an injunction or other appropriate relief in the court of common pleas to abate excessive sedimentation and secure compliance with the rules adopted under this section. If the prosecuting attorney seeks an injunction or other appropriate relief, then, in granting relief, the Court of Common Pleas may order the construction of sediment control improvements or implementation of other control measure and may assess a civil fine of not less than one hundred or more than five hundred dollars. Each day of violation of a rule or stop work order issued under this section shall be considered a separate violation subject to a civil fine.

2. The person to who a stop work order is issued under this section may appeal the order to Lorain County Common Pleas Court issued, seeking any equitable or other appropriate relief from that order.

3. No stop work order shall be issued under this section against any public highway transportation, or drainage improvement or maintenance project undertaken by a government agency or political subdivision in accordance with a statement of its standard sediment control policies that is approved by the Board or the Chief of the Division of Soil and Water Conservation, Ohio Department of Natural Resources.

The Administrator shall have the authority to require immediate on-site adjustments to the ESC Plan in order to achieve compliance with these Rules.

A final inspection will be made to determine if the criteria of these Rules have been satisfied and a report will be presented to the Board of Lorain County Commissioners on the site's compliance status.

The Administrator will monitor soil-disturbing activities for non-farm residential, commercial, industrial, or other non-farm purposes on land of less than one contiguous acre to ensure compliance required by these Rules.

The Administrator shall notify the U.S. Army Corps of Engineers when there is a violation on a development project covered by an Individual or Nationwide Permit. The Administrator shall notify the Ohio Environmental Protection Agency when there is a violation on a development project covered by a Section 401 Water Quality Certification and/or Isolated Wetland Permit.

The Administrator shall not review or approve erosion and sediment control plans, of any type, for applicants that have an existing development project or site(s) that is not in compliance with its approved erosion and sediment control plan, or a project site(s) that is otherwise not in compliance with the Lorain County Erosion and Sediment Control Rules.

The Administrator shall not review or approve Erosion and Sediment Control Plans for sublots or other areas within existing development projects that are not in compliance with its approved Erosion and Sediment Control Plan or otherwise not in compliance with the Lorain County Erosion and Sediment Control Rules. Such development projects include but not limited to, subdivisions or other common plans of development

The County of Lorain reserves the right to withhold relevant inspections and/or other approvals from its departments and/or agencies for development projects or activities in support of development projects that are not in compliance with these Rules.

The County shall not issue building permits for projects regulated under the Lorain County Erosion and Sediment Control Rules that have not received approval for an Erosion and Sediment Control Plan for said project(s).

7. Who is responsible for overall management and implementation of your construction site storm water control program and, if different, who is responsible for each of the BMPs identified for this program;

The Storm Water Management Team as outlined in the organizational chart is responsible for the overall management and implementation of the construction site runoff control program. The SWMT will contract with various entities as necessary to review all ESC plans and perform onsite inspections of construction sites. Responsible party for each of the BMPs is listed in Section 4.4.3.

8. Describe how you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

The SWD has provided a mechanism to control erosion and sediment on construction sites by resolution and adoption of Erosion and Sediment Control Rules. These rules include procedures for development and review of ESC plans and site inspections. The success of this MCM will be evaluated annually to determine the number of plans reviewed and inspections performed. Public submittals of information regarding sites not in compliance with the rules will also be reviewed annually to determine how compliance issues were resolved. Measurable goals were selected based on the expected ability of the SWD to meet those goals.

4.4.3. MCM #4 - Construction Site Storm Water Runoff Control BMPs

BMP Description:	Construction Erosion & Sediment Control Resolution	**BMP #**	MCM4-01
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	An updated resolution was passed by the Lorain County Board of Commissioners in November 2019 adopting the Erosion and Sediment Control Rules.		
Rationale:	The resolution adopts Erosion and Sediment Control Rules which provide the SWD with a means to control sediment and erosion from construction sites.		
Method:	The Lorain County Commissioners passed this resolution following public comment.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed with the passing of the resolution.		
TMDL's Targeted:	All approved TMDL's will be targeted with the passing of the resolution		

BMP Description:	Erosion & Sediment Control Rules	**BMP #**	MCM4-02
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	The Erosion and Sediment Control Rules have been adopted by the Lorain County Board of Commissioners.		
Rationale:	The Erosion and Sediment Control Rules provide guidance to engineers, contractors and developers on design and construction practices required by Lorain County. They also provide guidance to SWD personnel as they review and inspect erosion and sediment control plans and construction.		
Method:	The rules are administered by the SWMT. Plan review and inspection is required for any disturbance greater than or equal to one acre.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by the erosion and sediment control rules.		
TMDL's Targeted:	The erosion and sediment control rules will target all approved TMDL's		

BMP Description:	Construction Erosion & Sediment Control BMP Fact Sheets	**BMP #**	MCM4-03
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	Fact sheets have been created and made available to the general public		
Rationale:	BMP fact sheets provide basic information on the use and benefit of those BMP acceptable per the Erosion and Sediment Control Rules		
Method:	BMP fact sheets have been made available on the Lorain County Soil & Water website as well as in various public places. SWCD and the Lorain County Engineer will promote the fact sheets in conjunction with duties outlined in the Erosion and Sediment Control Rules.		
Target Pollutants:	All construction pollutants targeted by the permit are expected to be addressed by the construction and sediment control BMP fact sheet.		
TMDL's Targeted:	TSS, DO/OE, Nutrients, Sediment		

BMP Description:	Construction Project Plan Review	**BMP #**	MCM4-04
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	All proposed construction project plans will be reviewed for compliance with the ESC checklist and granted approval or provided comments on rejection.		
Rationale:	Lorain County has prepared an ESC plan checklist that can be completed by both the designer and the reviewer. The checklist outlines the required items in the ESC plan. Requirements include water quality permit verification for wetlands, and water quality certification. ESC plan review is under the control of the SWD and may be contracted out to various entities.		
Method:	The Administrator shall review the ESC plan and approve or return for revision with comments and recommendations for revision, within Thirty (30) working days after receipt of said plan. A plan rejected because of deficiencies shall receive a narrative report stating specific problems and the procedure for filing a revised plan. At the time of receipt of a revised plan, another 30-day review period shall be commenced.		
Target Pollutants:	All construction pollutants targeted by the permit are expected to be addressed by the construction site inspection BMP.		
TMDL's Targeted:	The construction site inspections will target all approved TMDL's		

BMP Description:	Construction site inspection	**BMP #**	MCM4-05
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	Inspections will be ongoing at active construction sites. Inspections and number of enforcement actions will be recorded.		
Rationale:	The inspection and evaluation program will provide the SWD with a way to ensure that active construction BMP's are being maintained and are functioning correctly throughout the sequence of construction on projects within the SWD jurisdiction.		
Method:	A program has been developed to allow SWD personnel to perform inspections of active construction sites using a standard checklist form to evaluate the sites compliance with the County Sediment and Erosion Control Rules along with the OEPA Construction General Permit OHC000005. Inspection will be conducted on a monthly basis with at least once every 31 calendar days. For areas within a watershed with an approved TMDL, an escalation to one inspection every 14 days for the following compliance issues: Construction activities have started at the site with no SWP3 reviewed and approved by the MS4; Failure to install sediment basin(s) when the SWP3 and/or site drainage clearly indicate as a first step (within 7 days prior to grading and within 7 days of grubbing); Construction activities taking place with no sediment/erosion controls; or Dewatering activities resulting in turbid discharges. Inspections can be returned to a monthly basis for the construction site once compliance with the above compliance issues have been addressed and verified.		
Target Pollutants:	All construction pollutants targeted by the permit are expected to be addressed by the construction site inspection BMP.		
TMDL's Targeted:	The construction site inspections will target all approved TMDL's		

4.5. MCM #5 - Post Construction Storm Water Management in New Development and Redevelopment

4.5.1. Permit Requirement/Performance Standards

Permit Requirement: *You shall develop, implement, and enforce a program to address storm water runoff from new development and redevelopment projects that disturb greater than or equal to one acre, including projects less than one acre that are part of a larger common plan of development or sale, that discharge into your small MS4. Your program shall ensure that controls are in place that will prevent or minimize water quality impacts;*

You shall develop and implement strategies which include a combination of structural and/or non-structural BMPs appropriate for your community;

You shall use an ordinance or other regulatory mechanism to address post-construction runoff from new development and redevelopment projects to the extent allowable under State or local law.

You shall ensure adequate long-term operation and maintenance of post-construction runoff controls, including provisions for when property changes ownership.

Performance Standard: *Your ordinance or other regulatory mechanism shall, at a minimum, be equivalent with the technical requirements set forth in OHC000005 applicable to your permit area. It shall require notification and approval of modifications to post-construction storm water runoff controls that occur after your initial SWP3 approvals. If you had coverage under the previous version of this permit (OHQ000003), you shall revise your ordinance or other regulatory mechanism, if needed, within one (1) year of the effective date of this permit.*

Y*our post-construction SWMP shall include pre-construction storm water pollution prevention plan review of all projects from construction activities that result in a land disturbance of greater than or equal to one acre to ensure that required controls are designed per requirements. An objective tool such as software or checklist shall be used to document each SWP3 review. Documentation of any communications regarding review and plan revisions shall be maintained.*

These applicable sites shall be inspected to ensure that controls are installed per requirements. An objective tool such as software or checklist shall be used to document each site inspection to ensure all conditions of OHC000005 are addressed.

Your program shall also ensure that long-term operation and maintenance (O&M) plans are developed and agreements in place for all applicable sites. Your operation and maintenance program shall ensure that private and public post construction runoff controls are being maintained per existing long-term O&M plans, agreements and local ordinances or other regulatory mechanisms. You shall maintain a copy of the long-term O&M plans and agreements provided during construction and document long-term O&M inspections. Your program shall

include, at a minimum, one on-site inspection by you or a third party of each post-construction runoff control during this permit term.

If your small MS4 discharges to a watershed with a U.S. EPA approved TMDL and any of the following pollutants are identified for your small MS4: Total Suspended Solids (Includes Sediment and Siltation); or 43 Nutrients (Includes Phosphorus, Nitrogen and Ammonia) your post-construction storm water management program shall provide: In addition to Parts III.B.1.c and III.B.2.c, an educational opportunity to contractors, SWP3 designers, and/or employees on OHC000005 Table 4b practices and/or other green infrastructure practices during the permit term. In addition, your program shall include, at a minimum, one of the following performance standards during the permit term: Retrofit one (1) existing storm water practice that solely provides a peak discharge function to meet the performance standard for an extended detention post-construction practice in accordance with OHC000005 Table 4a or 4b; or Perform restoration of at least three hundred linear feet of channelized stream where natural channel stability and floodplain restoration will reduce stream erosion; or Update your ordinance or other regulatory mechanism to require OHC000005 Table 4b practices and/or other green infrastructure practices where feasible; or e. Install one (1) or more OHC000005 Table 4b practices to treat a minimum of 1 acre of existing impervious area developed prior to 2003. These TMDL performance standards may be implemented outside your jurisdictional boundary but shall be implemented within the identified TMDL Project watershed in Appendix A.

4.5.2. Decision Process

1. Your program to address storm water runoff from new development and redevelopment projects. Include in this description any specific priority areas for this program.

The SWD has developed and implemented Comprehensive Storm Water Management Regulations by resolution that addresses storm water runoff from new and redevelopment projects. The resolution and current rules are attached as Exhibit 4 – . The Comprehensive Storm Water Management Regulations apply to all unincorporated areas of the County and are to be implemented in the City of Oberlin and Village of South Amherst as well.

2. How your program will be specifically tailored for your local community, minimize water quality impacts, and attempt to maintain pre-development runoff conditions.

The post construction storm water runoff control program has been created to direct land developers to:

1. Control storm water runoff from their property and ensure that all storm water management practices are properly designed, constructed, and maintained.
2. Reduce water quality impacts to receiving water resources that may be caused by new development or redevelopment activities.
3. Control the volume, rate, and quality of storm water runoff originating from their property so that surface water and ground water are protected and flooding and erosion potential are not increased.
4. Minimize the need to construct, repair, and replace subsurface storm drain systems.

5. Preserve natural infiltration and ground water recharge, and maintain subsurface flow that replenishes water resources, except in slippage prone soils.
6. Incorporate storm water quality and quantity controls into site planning and design at the earliest possible stage in the development process.
7. Reduce the expense of remedial projects needed to address problems caused by inadequate storm water management.
8. Maximize use of storm water management practices that serve multiple purposes including, but not limited to, flood control, erosion control, fire protection, water quality protection, recreation, and habitat preservation.

The program requires that a Comprehensive Storm Water Management Plan be developed and implemented to address quality and quantity of storm water discharged from a site following construction. Storm Water Quality Controls are to be implemented in accordance with the Ohio Rain Water and Land Development Manual, current edition, as per Chapter 9, Section C: Storm Water Quality Control of the Comprehensive Storm Water Regulations. Storm Water Rate Controls are to be implemented using the critical storm method as per Chapter 9, Section D: Storm Water Rate Control of the Comprehensive Storm Water Regulations.

3. Any non-structural BMPs in your program, including, as appropriate: green infrastructure storm water management techniques, policies and ordinances that provide requirements and standards to direct growth to identified areas, protect sensitive areas such as wetlands and riparian areas, maintain and/or increase open space (including a dedicated funding source for open space acquisition), provide buffers along sensitive water bodies, minimize impervious surfaces, and minimize disturbance of soils and vegetation; policies or ordinances that encourage infill development in higher density urban areas, and areas with existing storm sewer infrastructure; education programs for developers and the public about project designs that minimize water quality impacts; and other measures such as minimization of the percentage of impervious area after development, use of measures to minimize directly connected impervious areas, and source control measures often thought of as good housekeeping, preventive maintenance and spill prevention.

Non-structural BMPs required by the SWD include a protection for water resources including streams and wetlands through the requirement that a 25 –foot minimum setback measured from the ordinary high watermark on all sides to be maintained as a permanent buffer and protected with construction fence during construction until final site stabilization occurs.

4. Any structural BMPs in your program, including, as appropriate: green infrastructure storm water management techniques, storage practices such as wet ponds and extended-detention outlet structures; filtration practices such as grassed swales, bioretention cells, sand filters and filter strips; and infiltration practices such as infiltration basins and infiltration trenches.

Structural BMPs that are allowed per the Comprehensive Storm Water Regulations include:

- Infiltration Basin or Trench
- Permeable Pavement
- Dry Extended Detention
- Wet Extended Detention
- Constructed Wetlands
- Bioretention

- Sand and other Media Filtration

Structural BMP requirements are outlined in Chapter 9, Section C: Storm Water Quality Control of the Comprehensive Storm Water Regulations. The SWD will provide training on the topic of green infrastructure and table 4b practices from OEPA Permit OHC00005 for the development community to encourage use of green infrastructure and low impact development when feasible.

5. The mechanisms (ordinance or other regulatory mechanisms) you will use to address post construction runoff from new developments and redevelopments and why you chose the mechanism(s). If you need to develop a mechanism, describe your plan and a schedule to do so. If your ordinance or regulatory mechanism is already developed, include a copy of the relevant sections with your program.

The SWD has developed and implemented Comprehensive Storm Water Management Regulations by resolution that addresses storm water runoff from new and redevelopment projects. The resolution and current rules are attached as Comprehensive Storm Water Management Regulations.

6. How you will ensure the long-term operation and maintenance (O&M) of your selected BMPs. Options to help ensure that future O&M responsibilities are clearly identified include an agreement between you and another party such as the post-development landowners or regional authorities.

The SWD requires that an Inspection and Maintenance Agreement be made between Lorain County and the post-development landowner. The agreement contains the following information and provisions per the Post Construction Storm Water Control Rules of Lorain County:

a. The location of each storm water management practice, including those practices permitted to be located in, or within fifty (50) feet of, water resources, and identification of the drainage area served by each storm water management practice.
b. A schedule for regular maintenance for each aspect of the storm water management system and description of routine and non-routine maintenance tasks to ensure continued performance of the system as is detailed in the approved Post-Construction Storm Water Management Plan. This schedule may include additional standards, as required by the Lorain County Engineer, to ensure continued performance of storm water management practices permitted to be located in, or within fifty (50) feet of, water resources.
c. The location and documentation of all access and maintenance easements on the property.
d. Identification of the landowner(s), organization, or municipality responsible for long-term maintenance, including repairs, of the storm water management practices.
e. The landowner(s), organization, or municipality shall maintain storm water management practices in accordance with this regulation.
f. Lorain County has the authority to enter upon the property to conduct inspections as necessary to verify that the storm water management practices are being maintained and operated in accordance with this regulation.

g. Lorain County shall maintain public records of the results of site inspections, shall inform the landowner(s), organization, or municipality responsible for maintenance of the inspection results, and shall specifically indicate any corrective actions required to bring the storm water practices into proper working condition.
h. If Lorain County notifies the landowner(s), organization, or municipality responsible for maintenance of the maintenance problems that require correction, the specific corrective actions shall be taken within a reasonable time frame as determined by Lorain County.
i. Lorain County is authorized to enter upon the property and to perform the corrective actions identified in the inspection report if the landowner(s), organization, or municipality responsible for maintenance does not make the required corrections in the specified time period. Lorain County shall be reimbursed by the landowner(s), organization, or municipality responsible for maintenance for all expenses incurred within 10 days of receipt of invoice from Lorain County.
j. The method of funding long-term maintenance and inspections of all storm water management practices.
k. A release of Lorain County from all damages, accidents, casualties, occurrences, or claims that might arise or be asserted against Lorain County from the construction, presence, existence, or maintenance of the storm water management practices.

Alteration or termination of these stipulations is prohibited. The applicant must provide a draft of this Inspection and Maintenance Agreement as part of the Comprehensive Storm Water Management Plan submittal. Once a draft is approved, a recorded copy of the Agreement must be submitted to Lorain County to receive final inspection approval of the site.

7. Who is responsible for overall management and implementation of your post-construction SWMP and, if different, who is responsible for each of the BMPs identified for this program.

The Storm Water Management Team as outlined in the organizational chart is responsible for the overall management and implementation of the Post Construction Storm Water Runoff Control program. The SWMT will contract with various entities as necessary to review all Storm Water Management Plans and perform onsite inspections of construction sites. Responsible party for each of the BMP's is listed in Section 4.5.3.

8. How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

The SWD has provided a mechanism to control Post Construction Storm Water Runoff by resolution and adoption of Comprehensive Storm Water Management Regulations. These rules include procedures for development and review of Storm Water Management Plans and site inspections. The success of this MCM will be evaluated annually to determine the number of plans reviewed and inspections performed. Periodic inspections of Post Construction BMPs will be performed to ensure compliance with the Inspection and Maintenance Agreement that is

required for new and redevelopment. Measurable goals were selected based on the expected ability of the SWD to meet those goals.

4.5.3. MCM #5 - Post Construction Storm Water Runoff Control BMP's

BMP Description:	Post Construction Storm Water Management Resolution (Resolution No. 09-806)	**BMP #**	MCM5-01
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	An updated resolution was passed by the Lorain County Board of Commissioners in October 2019 adopting the Comprehensive Storm Water Management Regulations.		
Rationale:	The resolution adopts Comprehensive Storm Water Management Regulations which provide the SWD with a means to control the quality of storm water discharged from a development after construction is complete.		
Method:	The Lorain County Commissioners passed this resolution following public comment.		
Target Pollutants:	All construction pollutants targeted by the permit are expected to be addressed by the resolution.		
TMDL's Targeted:	The Resolution will allow for targeting of all approved TMDL's		

BMP Description:	Comprehensive Storm Water Management Regulations	**BMP #**	MCM5-02
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	The Comprehensive Storm Water Management Regulations have been adopted by the Lorain County Commissioners in October 2019.		
Rationale:	The Comprehensive Storm Water Management Regulations provide guidance to engineers, contractors and developers on design and construction practices required by the SWD. They also provide guidance to SWD personnel as they review and inspect post construction storm water management plans and construction.		
Method:	The Comprehensive Storm Water Management Regulations provide guidance to engineers, contractors and developers on design and construction practices required by the SWD. They also provide guidance to SWD personnel as they review and inspection erosion and sediment control plans and construction. Plan review is required for any disturbance greater than or equal to one acre.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by the comprehensive storm water management regulations.		
TMDL's Targeted:	The rules target all approved TMDL's		

BMP Description:	Post Construction Storm Water Management BMP Fact sheets	**BMP #**	MCM5-03
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	Fact sheets have been created and made available to the general public on the Lorain County Soil & Water website.		
Rationale:	BMP fact sheets provide basic information on the use and benefit of those BMP's acceptable per the Post Construction Storm Water Management Rules		
Method:	BMP fact sheets have been made available on the website as well as in various public places. SWCD and the Lorain County Engineer will promote the fact sheets in conjunction with duties outlined in the Post Construction Storm Water Management Rules.		
Target Pollutants:	All construction pollutants targeted by the permit are expected to be addressed by the post construction storm water management BMP fact sheet.		
TMDL's Targeted:	TSS, DO/OE, Nutrients, Sediment		

BMP Description:	Post Construction Storm Water Management Facility Inspection and Evaluation Program	**BMP #**	MCM5-04
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	Inspections will be ongoing annually. All facilities will be inspected during the permit term.		
Rationale:	The inspection and evaluation program will provide the SWD with a way to ensure that Post Construction BMP's are being maintained and are functioning correctly.		
Method:	A program has been developed to allow SWD personnel to perform inspections of post construction facilities using a standard checklist form to evaluate maintenance activities and performance of the BMP.		
Target Pollutants:	All construction pollutants targeted by the permit are expected to be addressed by the construction site inspection and evaluation BMP.		
TMDL's Targeted:	The inspection program will ensure BMP's are working as designed and are effectively targeting the approved TMDL's.		

BMP Description:	Green Infrastructure and Table 4b Training Program	**BMP #**	MCM5-05
Responsible Party:	SWMT	**Legal Authority:**	Y
Measurable Goals:	The SWD will provide training on the topic of green infrastructure and table 4b practices from OEPA Permit OHC00005 for the development community. Number of training attendees will be reported.		
Rationale:	To meet the OEPA performance standard for communities discharging to an established TMDL provide training opportunity for the development community on the topic of green infrastructure and table 4b practices from OEPA Permit OHC00005 to encourage the use of low impact practices thereby improving the water quality of our streams and lakes.		
Method:	Provide a training opportunity for the development community on the topic of green infrastructure and table 4b practices from OEPA Permit OHC00005 to encourage the use of low impact practices.		
Target Pollutants:	All construction pollutants targeted by the permit are expected to be addressed by the post construction storm water management training.		
TMDL's Targeted:	Bacteria, TSS, Nutrients, DO/OE		

BMP Description:	TMDL Performance Standard Project	**BMP #**	MCM5-06
Responsible Party:	SWMT, Oberlin City	**Legal Authority:**	Y
Measurable Goals:	The SWD will select and implement 4 projects from the TMDL performance standard options based on the water quality benefits and feasibility over the permit term.		
Rationale:	Select and implement an improvement project from the TMDL performance standard list in the 4 regulated communities thereby improving the water quality of our streams and lakes.		
Method:	Evaluate, select, and implement 4 projects from the TMDL performance standard list in the 4 regulated comminutes Elyria Township, Carlisle Township, Lorain County, and the City of Oberlin. Lorain county will be responsible for the two townships and the Lorain County project while the City of Oberlin will be responsible for selecting and implementing their own project.		
Target Pollutants:	All pollutants targeted by the permit could possibly be addressed by the TMDL Performance Standard Projects.		
TMDL's Targeted:	All pollutants targeted by the TMDLs could possibly be addressed by the TMDL Performance Standard Projects.		

4.6. MCM #6 - Pollution Prevention and Good Housekeeping

4.6.1. Permit Requirement/Performance Standards

Permit Requirement: *You shall develop and implement an operation and maintenance program that includes a training component and has the ultimate goal of preventing or reducing pollutant runoff from municipal operations; and*

Using training materials that are available from Ohio EPA or other organizations, your program shall include employee training to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance; and

You shall include a list of industrial facilities you own or operate that are subject to Ohio EPA's Industrial Storm Water General Permit or individual NPDES permits for discharges of storm water associated with industrial activity that ultimately discharge to your MS4. Include the Ohio EPA permit number or a copy of the Industrial NOI form for each facility. For your municipal facilities that conduct activities described in 40 CFR 122.26(b)(14) that are not required to obtain Industrial Storm Water General Permit coverage, including vehicle maintenance facilities, bus terminals, composting facilities, impoundment lots and waste transfer stations, a Storm Water Pollution Prevention Plan (SWPPP) shall be developed and implemented in accordance with the SWP3 requirements of Ohio EPA's Industrial Storm Water General Permit (OHR000006).

Performance Standard: *Your pollution prevention/good housekeeping program shall include, at a minimum, an annual employee training. Your operation and maintenance program shall include appropriate procedures, controls, maintenance schedules and recordkeeping to address Part III.B.6.d.iii of this permit.*

Your salt piles shall be covered with no run-on and subsequent run-off of salt. All tanks of brine or other liquid road treatments shall have secondary containment or alternatively bollard or barrier protection. This performance standard shall be completed no later than two (2) years after the effective date of this permit for small MS4s renewing coverage under this permit.

For areas of soil disturbance associated with ditch/MS4 maintenance caused by the small MS4, soil stabilization shall, at a minimum, be initiated in accordance with the time frames specified in the following:

Not within 50 feet of a surface water of the State Within 7 days of reaching final grade or within the first 7 days if a disturbed area will remain inactive for over 14 days.

Within 50 feet of a surface water of the State Within 2 days of reaching final grade or within 2 days if the area is to remain inactive for over 14 days.

Implementation of this performance standard shall commence no later than two (2) years after the effective date of this permit for small MS4s renewing coverage under this permit.

If your small MS4 discharges to a watershed with a U.S. EPA approved TMDL and any of the following pollutants are identified for your small MS4: Total Suspended Solids (Includes Sediment and Siltation); Nutrients (Includes Phosphorus, Nitrogen and Ammonia); E. coli Bacteria; Metals; or Dissolved Oxygen and Organic Enrichment Your pollution prevention/good housekeeping program shall include, at a minimum, one of the following performance standards: Implementation of this permit requirement shall NPDES Permit No.: OHQ000004 Page 20 of 43 commence no later than two (2) years after the effective date of this permit for small MS4s renewing coverage under this permit.

1. Develop and implement a street sweeping program with proper debris management and disposal. Your program shall document debris collected to prioritize areas to sweep and/or document lane miles swept. At a minimum, sweeping shall occur on curbed streets two times per year; or

2. Develop and implement a catch basin cleaning program with proper debris management and disposal. Your program shall document debris collected to prioritize areas to clean. At a minimum, catch basins shall be scheduled to be cleaned once every five years; or

3. Develop and implement a leaf/yard waste collection program; or

4. For small MS4 facilities that do not require NPDES industrial storm water general permit coverage but require a SWPPP in accordance with Part III.B.6.c of this permit, conduct routine facility inspections for these facilities at least quarterly (i.e., once each calendar quarter). You shall document the findings of each routine facility inspection performed and maintain this documentation onsite with your SWPPP. At a minimum, your documentation of each routine facility inspection shall include: The inspection date and time; The name(s) and signature(s) of the inspector(s); Weather information and a description of any discharges occurring at the time of the inspection; Any previously unidentified discharges of pollutants from the site; Any control measures needing maintenance or repairs; Any failed control measures that need replacement; Any incidents of failure to implement your SWPPP observed; Any additional control measures needed.

4.6.2. Decision Process

1. Your operation and maintenance program to prevent or reduce pollutant runoff from your municipal operations. Your program shall specifically list the municipal operations that are impacted by this operation and maintenance program.

The SWD has had an O & M program in place since 2008 for the facility on Russia Road. The O & M program has been generalized to cover all County, Township, Village of South Amherst and City of Oberlin Facilities within Urbanized Areas and will be updated by the end of 2021. Each

facility operator will be expected to tailor and implement the O&M plan for each facility by the end of 2022. The municipal operations that are impacted by the O & M program include:

- Lorain County
  - Maintenance Facility (Maintenance, Salt Storage, Impound Lot)
    42100 Russia Road
    Elyria, Ohio 44035
- Amherst Township
  - No Facilities in Urbanized Area
- Carlisle Township
  - No Facilities in Urbanized Area
- Elyria Township
  - Maintenance Facility (Maintenance, Salt Storage, Composting)
    41416 Griswold Rd
    Elyria, Oh 44050
- Eaton Township
  - No Facilities in Urbanized Area
- Grafton Township
  - No Facilities in Urbanized Area
- Sheffield Township
  - Maintenance Facility (Maintenance, Salt Storage)
    5166 Clinton Ave.
    Lorain, Oh 44055
- Columbia Township
  - No Facilities in Urbanized Area
- City of Oberlin
  - Oberlin Municipal Light & Power System Project
    289 South Professor Street
    Oberlin, OH 44074

  The City of Oberlin also plans to implement the O&M program at the following municipal facilities that are not located within an urbanized area:
  - Oberlin Westwood Cemetery
    429 Morgan Street
    Oberlin, OH 44074
  - Oberlin Compost Facility
    E. Lorain Street
    Oberlin, OH 44074
  - Oberlin Service Complex
    583 Hillcreek Drive
    Oberlin, OH 44074
- Village of South Amherst

- Fire Station (Maintenance)
  103 W. Main Street
  South Amherst, OH 44001
- Maintenance Garage (Maintenance, Washing, Stockpiling)
  517 W. Main Street
  South Amherst, OH 44001

2. Any government employee training program you will use to prevent and reduce storm water pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and storm water system maintenance. Describe any existing, available materials you plan to use. Describe how this training program will be coordinated with the outreach programs developed for the public information minimum measure and the illicit discharge minimum measure.

Per the O & M program currently in place for the SWD, "Successful storm water pollution control relies in large part on proper training and education of employees". Many of the recommended BMP's in this PPGHP will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMP's that apply to operations within each facility. Training can be completed separately or done in conjunction with regular employee training procedures. Employee training will emphasize the importance of keeping pollutants out of the storm drains, because the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain so that they understand the importance of preventing storm water pollution. The following training will be implemented by [Facility Managers]

- Experienced workers or other trained personnel will be used to train facility employees.
- Training will be completed and documented once per year for all appropriate personnel
- New personnel will be required to review and understand this document prior to initiating work activities"

Additionally, Lorain County PIPE offers training sessions in conjunction with Ohio EPA which cover Public Education, Pollution Prevention/Good Housekeeping and Illicit Discharge measures. These training sessions are part of the Public Education MCM BMPs.

3. Your program description shall specifically address the following areas:

a. Maintenance activities, maintenance schedules, and long-term inspection procedures for controls to reduce floatables and other pollutants to your MS4.

b. Controls for reducing or eliminating the discharge of pollutants from streets, roads, highways, municipal parking lots, maintenance and storage yards, waste transfer

stations, fleet or maintenance shops with outdoor storage areas, and salt/sand storage locations and snow disposal areas you operate. A description of the materials used for roadway and municipal parking lot winterization (use of salt, sand, bottom ash, etc. or combination thereof), associated application rates, and the rationale for the selected application rates shall be included. Also identify controls or practices to be used for reducing or eliminating discharges of pollutants resulting from roadway and municipal parking lot winterization activities.

The SWD has an existing Operation and Maintenance (O & M) program that provides written procedures for all municipal activities provided and facilities managed by the County and member Communities per the MS4 permit requirements.

c. Procedures for the proper disposal of waste removed from your MS4 and your municipal operations, including dredge spoil, accumulated sediments, floatables, and other debris.

The SWD performs maintenance activities that have controls in place to reduce pollutants and properly disposes of waste. Also, the SWD has an existing Operation and Maintenance (O & M) program that provides written procedures for all municipal activities provided by the County and member Communities per the MS4 permit requirements. This O & M program is updated periodically to meet new MS4 requirements and potential sources of pollution.

d. Procedures to ensure that new flood management projects are assessed for impacts on water quality and existing projects are assessed for incorporation of additional water quality protection devices or practices.

The County Engineer's office is responsible for reviewing all new flood management projects in unincorporated areas, and the Oberlin City Engineer is responsible for reviewing all new flood management projects within the City of Oberlin. Per the County Post Construction Rules currently in effect, new developments are required to provide flood management with incorporated water quality design. For public flood control projects, the County Engineer's office hires design teams using qualifications-based selection to ensure that a design team is engaged that is qualified to provide flood management as well as water quality design. The public flood management projects will also be reviewed by County Engineer staff for water quality impacts. Existing projects will be assessed for incorporation of additional water quality protection devices or practices with the Post Construction Inspection and Evaluation program.

4. Who is responsible for overall management and implementation of your pollution prevention/good housekeeping program and, if different, who is responsible for each of the BMPs identified for this program.

The Storm Water Management Team as outlined in the organizational chart is responsible for the overall management and implementation of the Pollution Prevention and Good

Housekeeping program. Facility Managers will be the responsible party as listed for each of the BMP's in Section 4.6.3.

5. How you will evaluate the success of this minimum measure, including how you selected the measurable goals for each of the BMPs.

Measurable goals for each of the BMP's have been outlined which provide a framework to ensure that permit requirements are met. The PPGHP provides reporting requirements for spills, quarterly inspections for sites within an TMDL regulated community and annual inspections for facilities that do no discharge to a regulated waterbody. These reports will be analyzed annually in conjunction with each BMP to determine if the program is helping to improve Pollution Prevention and Good Housekeeping and County, Municipalities and Township Facilities.

4.6.3. MCM #6 - Pollution Prevention and Good Housekeeping BMP's

BMP Description:	Municipal Facilities Storm Water Pollution Prevention Plans (SWP3) (Exhibit 7)	**BMP #**	MCM6-01
Responsible Party:	SWMT will be responsible to create and update the SWP3 for each of the facilities. Each of the facility owners will be responsible for implementation and compliance with the SWP3 for their specific facility. (i.e. Townships and Municipalities will be responsible for implementing and complying with the SWP3 for their specific facilities)	**Legal Authority:**	Y
Measurable Goals:	SWP3's for each of the facilities required per the permit have been developed previously and will be updated by the end of 2021. Facility owners will be responsible for implementing the SWPPP updates by the end of 2022.		
Rationale:	The SWP3 provides facility operators a map for good sediment and erosion control practices that should be implemented to keep the facility in compliance with Ohio EPA		
Method:	SWP3's have been developed and will be updated by a consultant formatted in accordance with Ohio EPA guidelines		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by SWP3's		
Target Audience:	Facility Operators		
TMDL's Targeted:	SWP3's will target all TMDL's present at municipal facilities		

BMP Description:	Municipal Facilities Operations & Maintenance Program	**BMP #**	MCM6-02
Responsible Party:	SWMT will be responsible for an update to the existing O & M program. Facility owners will be responsible for tailoring the program for their specific facility and for complying with the O & M program. (i.e. Townships and Municipalities will be responsible for tailoring and complying with the O & M program for their specific facilities)	**Legal Authority:**	Y
Measurable Goals:	An O & M manual has already been developed for the SWD. This O & M manual will require updating to include information required by the permit by the end of 2021. Facility owners will be responsible for implementing the O & M program updates by the end of 2022.		
Rationale:	The O & M Manual provides facility operators a map for good housekeeping practices.		
Method:	The O & M Manual has been developed and will be distributed to facility operators for review and implementation following update.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by the O&M program.		
Target Audience:	Facility Operators		
TMDL's Targeted:	Updating O&M programs will ensure all facilities are targeting TMDL's present at specific facilities		

BMP Description:	Employee Training Program	**BMP #**	MCM6-03
Responsible Party:	SWMT/Township Trustees/Municipality	**Legal Authority:**	Y
Measurable Goals:	This BMP has already been implemented by SWD. The announcements about employee training opportunities are currently distributed to the Townships and Municipalities. Announcements will continue to be sent out and the number of employees that received training will be evaluated annually.		
Rationale:	Providing training to employees in good housekeeping measures will help them recognize pollutants and potential areas where pollutants could be released as well as provide information on how to avoid allowing those pollutants to be released.		
Method:	The SWD will provide announcements of employee training opportunities. The SWD will be responsible to ensure County employees are trained. Townships and Municipalities will be responsible to ensure that their respective employees are trained.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by the employee training BMP.		
Target Audience:	County, Municipality and Township Employees		
TMDL's Targeted:	Employee training will assist the prevention of all approved TMDL's		

BMP Description:	Municipal Facilities Inspections	**BMP #**	MCM6-04
Responsible Party:	SWMT will be responsible to create and implement an inspection program for each of the facilities. Facility operators will be responsible compliance with the SWP3 inspections for their specific facility.	**Legal Authority:**	Y
Measurable Goals:	SWP3 inspections for each of the facilities will be performed documenting standard inspection questions on a quarterly basis for facilities within a TMDL regulated community and annually for community that do not discharge to a TMDL regulated waterbody at the beginning of 2022. Number of inspections and corrective actions will be recorded.		
Rationale:	The SWP3 inspection program provides facility operators and the SWD a mechanism to endure good stormwater pollution prevention practices that should be implemented to keep the facility in compliance with Ohio EPA.		
Method:	Conduct routine facility inspections for municipal operated facilities at least quarterly for facilities that are within a TMDL regulated community and annually for facilities that do not discharge to a TMDL regulated waterbody. Document the findings of each routine facility inspection performed and maintain this documentation onsite with your SWPPP. At a minimum, documentation of each routine facility inspection shall include: The inspection date and time; The name(s) and signature(s) of the inspector(s); Weather information and a description of any discharges occurring at the time of the inspection; Any previously unidentified discharges of pollutants from the site; Any control measures needing maintenance or repairs; Any failed control measures that need replacement; Any incidents of failure to implement your SWPPP observed; Any additional control measures needed.		
Target Pollutants:	All pollutants targeted by the permit are expected to be addressed by SWP3 inspections		
Target Audience:	Facility Operators		
TMDL's Targeted:	SWP3 inspections will target all TMDL's present at municipal facilities		

5. Reporting Requirements

Ohio EPA requires that an annual report be submitted by April 1st of each year. These reports must be filled out on the form provided by Ohio EPA which is found on their website at HTTP://WWW.EPA.STATE.OH.US/DSW/PERMITS/GP_MS4STORMWATER.ASPX.

6. Funding

The LCSWD has implemented a storm water utility fee with collection starting in 2011. A portion of that fee is set aside to implement and fund the Storm Water Management Program for the SWD. The storm water utility fee was created in accordance with Ohio Revised Code 6117 which authorizes the implementation of a utility fee to pay for storm water related issues including the "costs of complying with the requirements of phase II of the storm water program of the national pollutant discharge elimination system established in 10 C.F.R. part 122" (ORC Chapter 6117.02 D).

7. Certification

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Michelle Hung	David J. Moore	Matt Lundy
Lorain County Storm Water	Lorain County Storm Water	Lorain County Storm Water
District Board Member	District Board Member	District Board Member

8. References

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State of Ohio. "Ohio Revised Code"

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Northeast Ohio Storm Water Training Council. "TMDL Community Identifier Table". http://www.neohiostormwater.com/

9. Exhibits

Exhibit 1 – Community MOU

Exhibit 2 – Illicit Discharge Resolutions

Exhibit 3 – Erosion Control Resolutions and Rules

Exhibit 4 – Comprehensive Storm Water Management Regulations

Exhibit 5 – HSTS Map and List of Addresses

Exhibit 6 – MS4 Map

Exhibit 7 – Site Specific Storm Water Pollution Prevention Plans

Exhibit 8 – Operation and Maintenance Plan

Exhibit 9 – IDDE program

Exhibit 10 – Memorandum of Understanding

Exhibit 11 – Table of Organizations

Exhibit 1 – Community MOU's

ORIGINAL MOU
WITH AMHERST TWP
RESOLUTION 12/6/12

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the Board of Trustees of AMHERST Township (Township) on the date set forth below.

Recitals

WHEREAS, both the County and Township are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and MS4 Designated Townships collectively to coordinate and collaborate on compliance with the permit requirements; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through compliance with the Lorain County Storm Water District Storm Water Management Program (SWMP), which may be updated periodically, and performance of the following items outlined in the minimum control measures (MCM) 1 through 6:

MCM #1 – Public Education and Outreach on Storm Water Impacts

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Education and Outreach activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- County will develop Public Education materials for County and Township use. These may include a brochure on the newly developed Storm Water District, Erosion Control Factsheets, Post Construction Factsheets and a County Public Education Factsheet. The County will also develop and maintain a webpage with links to these brochures along with other information
- As per the Storm water management program, the County will work with LCPIPE to prepare a public education plan each year which will provide education on a new storm water message each year while using more than one mechanism to get the message across. The County will target 50% of the population during each permit term (5 years).

Township Responsibility:

- Townships will need to make the Factsheets developed by County available at Township Halls and other Township public meeting places.
- The Storm Water District Brochure has already been printed by the County, Townships will need to keep them available to the public at township halls and other township public meeting places.
- Provide link to County Storm Water district Website on Township Websites, if in existence.
- Forward Webinar promotion information to township employees
- Follow LCPIPE prepared public education plan in conjunction with County
- Track number of educational materials distributed and report numbers back to County at end of each year.

MCM #2 – Public Involvement / Participation

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Involvement/Participation activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The County is responsible for the development of Public Involvement and Participation activities which may include:
    - Storm Water Advisory Committee (SWAC)
    - Lorain County Public Involvement and Public Education (LCPIPE) Work Group
    - Solid and Hazardous Waste Disposal
    - Lorain County Pride Day

    - Lorain County Adopt a Highway Program
- The County will develop an annual public involvement and participation plan which will include a minimum of 1 event per year.

Township Responsibility:

- Townships are responsible to make sure that Involvement activities are advertised to Township employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Illicit Discharge Detection & Elimination activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Assist Townships with inventory of the current practices associated with Illicit Discharge Detection & Elimination Program (IDDE) within the Townships
- Based on the inventory of current practices the County will develop an Illicit Discharge Detection & Elimination (IDDE) Program that will include the following components: (a) mapping the MS4 and its outfalls (with annual updates), (b) mapping the location of home sewage treatment systems (HSTSs) that discharge to the MS4 and compiling a list of addresses of those systems, (c) performing dry weather screening of all outfalls by the end of the current permit term, (d) developing an enforcement protocol and elimination plan for illicit discharges discovered during dry weather screening and other detection means, and (e) educating public employees, businesses and the general public to identify and report illicit discharges. Responsible parties for each of the components will be outlined in the IDDE Program.
- Assist Townships to perform dry weather screening of outfalls in MS4s consistent with the SWMP.

Township Responsibility:

- Pass resolution to prohibit Illicit Discharge if not already completed.
- Assist County in collection and inventory of current IDDE practices including providing information on:
    - MS4 Outfalls (location and screening)
    - MS4 Mapping information as necessary for County to develop comprehensive storm sewer system map
        - showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins,

pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County to perform dry weather screening of outfalls within the Township. The County will create a program outlining requirements and developing standard forms. The Townships will then need to use those forms to perform a dry weather screening of their outfalls.
- Inform township employees, businesses and general public of educational opportunities relating to illicit discharge.

MCM #4 – Construction Site Storm Water Runoff Control

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Construction Site Storm Water Runoff Control activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Construction Site Erosion Control regulations that have been implemented and which must be followed by all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Target 1 site inspection per site per month at active construction sites or develop alternative inspection schedule based on the status of construction activities at the site.
- Follow enforcement escalation plan outlined in the regulations.

Township Responsibility:

- Comply with Construction Site Erosion Control Regulations
- Report known violations to Lorain County

MCM #5 – Post Construction Storm Water Management

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Post Construction Storm Water Management activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County

Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.

- Perform as-built inspections
- Provide maintenance of County owned BMP's.

Township Responsibility:

- Comply with Post Construction Storm Water Regulations
- Report known violations to Lorain County
- Provide maintenance of Township owned BMP's.

MCM #6 – Pollution Prevention / Good Housekeeping

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Pollution Prevention/Good Housekeeping activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Lorain County has developed a generic Operation and Maintenance Manual that can be used by the Townships. This manual will be updated by the County in 2012 and provided to the Townships.
- Create Storm Water Pollution Prevention Plans (SWP3) for Township Facilities under the Ohio EPA MS4 permit coverage. Facilities subject to the permit are listed in the SWMP

Township Responsibility:

- Expand upon and implement O & M manual for specific Township Facilities. These manuals must be updated for township facilities by the end of 2013.
- Implement and follow SWP3 for Township Facilities
- Perform annual comprehensive site evaluation, as required
- Ensure Township Employees receive required training
- Log employee training hours
- Provide year end reporting to County

Lorain County will actively work to provide compliance with the EPA NPDES minimum control measures for which it is responsible as part of the MOU. However, the Township agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Township's responsibility to ensure compliance and maintain liability for said compliance pursuant to Ohio EPA NPDES permit No.: OHQ000002 Part III.C.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 4-8-13

BOARD OF TRUSTEES OF AMHERST TOWNSHIP

By: Neil J. Lynch
NEIL J. LYNCH

Date: December 11, 2012

AMHERST TOWNSHIP RESOLUTION NO.: 12/06/12

COPY

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the Board of Trustees of CARLISLE Township (Township) on the date set forth below.

Recitals

WHEREAS, both the County and Township are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and MS4 Designated Townships collectively to coordinate and collaborate on compliance with the permit requirements; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through compliance with the Lorain County Storm Water District Storm Water Management Program (SWMP), which may be updated periodically, and performance of the following items outlined in the minimum control measures (MCM) 1 through 6:

MCM #1 – Public Education and Outreach on Storm Water Impacts

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Education and Outreach activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- County will develop Public Education materials for County and Township use. These may include a brochure on the newly developed Storm Water District, Erosion Control Factsheets, Post Construction Factsheets and a County Public Education Factsheet. The County will also develop and maintain a webpage with links to these brochures along with other information
- As per the Storm water management program, the County will work with LCPIPE to prepare a public education plan each year which will provide education on a new storm water message each year while using more than one mechanism to get the message across. The County will target 50% of the population during each permit term (5 years).

Township Responsibility:

- Townships will need to make the Factsheets developed by County available at Township Halls and other Township public meeting places.
- The Storm Water District Brochure has already been printed by the County, Townships will need to keep them available to the public at township halls and other township public meeting places.
- Provide link to County Storm Water district Website on Township Websites, if in existence.
- Forward Webinar promotion information to township employees
- Follow LCPIPE prepared public education plan in conjunction with County
- Track number of educational materials distributed and report numbers back to County at end of each year.

MCM #2 – Public Involvement / Participation

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Involvement/Participation activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The County is responsible for the development of Public Involvement and Participation activities which may include:
  - Storm Water Advisory Committee (SWAC)
  - Lorain County Public Involvement and Public Education (LCPIPE) Work Group
  - Solid and Hazardous Waste Disposal
  - Lorain County Pride Day

- Lorain County Adopt a Highway Program
- The County will develop an annual public involvement and participation plan which will include a minimum of 1 event per year.

Township Responsibility:

- Townships are responsible to make sure that Involvement activities are advertised to Township employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Illicit Discharge Detection & Elimination activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Assist Townships with inventory of the current practices associated with Illicit Discharge Detection & Elimination Program (IDDE) within the Townships.
- Based on the inventory of current practices the County will develop an Illicit Discharge Detection & Elimination (IDDE) Program that will include the following components: (a) mapping the MS4 and its outfalls (with annual updates), (b) mapping the location of home sewage treatment systems (HSTSs) that discharge to the MS4 and compiling a list of addresses of those systems, (c) performing dry weather screening of all outfalls by the end of the current permit term, (d) developing an enforcement protocol and elimination plan for illicit discharges discovered during dry weather screening and other detection means, and (e) educating public employees, businesses and the general public to identify and report illicit discharges. Responsible parties for each of the components will be outlined in the IDDE Program.
- Assist Townships to perform dry weather screening of outfalls in MS4s consistent with the SWMP.

Township Responsibility:

- Pass resolution to prohibit Illicit Discharge if not already completed.
- Assist County in collection and inventory of current IDDE practices including providing information on:
  - MS4 Outfalls (location and screening)
  - MS4 Mapping information as necessary for County to develop comprehensive storm sewer system map
    - showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins,

pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County to perform dry weather screening of outfalls within the Township. The County will create a program outlining requirements and developing standard forms. The Townships will then need to use those forms to perform a dry weather screening of their outfalls.
- Inform township employees, businesses and general public of educational opportunities relating to illicit discharge.

MCM #4 – Construction Site Storm Water Runoff Control

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Construction Site Storm Water Runoff Control activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Construction Site Erosion Control regulations that have been implemented and which must be followed by all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Target 1 site inspection per site per month at active construction sites or develop alternative inspection schedule based on the status of construction activities at the site.
- Follow enforcement escalation plan outlined in the regulations.

Township Responsibility:

- Comply with Construction Site Erosion Control Regulations
- Report known violations to Lorain County

MCM #5 – Post Construction Storm Water Management

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Post Construction Storm Water Management activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County

Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Perform as-built inspections
- Provide maintenance of County owned BMP's.

Township Responsibility:
- Comply with Post Construction Storm Water Regulations
- Report known violations to Lorain County
- Provide maintenance of Township owned BMP's.

MCM #6 – Pollution Prevention / Good Housekeeping

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Pollution Prevention/Good Housekeeping activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:
- Lorain County has developed a generic Operation and Maintenance Manual that can be used by the Townships. This manual will be updated by the County in 2012 and provided to the Townships.
- Create Storm Water Pollution Prevention Plans (SWP3) for Township Facilities under the Ohio EPA MS4 permit coverage. Facilities subject to the permit are listed in the SWMP

Township Responsibility:
- Expand upon and implement O & M manual for specific Township Facilities. These manuals must be updated for township facilities by the end of 2013.
- Implement and follow SWP3 for Township Facilities
- Perform annual comprehensive site evaluation, as required
- Ensure Township Employees receive required training
- Log employee training hours
- Provide year end reporting to County

Lorain County will actively work to provide compliance with the EPA NPDES minimum control measures for which it is responsible as part of the MOU. However, the Township agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Township's responsibility to ensure compliance and maintain liability for said compliance pursuant to Ohio EPA NPDES permit No.: OHQ000002 Part III.C.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 3/28/13

BOARD OF TRUSTEES OF CARLISLE TOWNSHIP

By: _____

Date: 11/19/2012

MLP 11/28/12

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the Board of Trustees of Columbia Township (Township) on the date set forth below.

Recitals

WHEREAS, both the County and Township are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and MS4 Designated Townships collectively to coordinate and collaborate on compliance with the permit requirements; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through compliance with the Lorain County Storm Water District Storm Water Management Program (SWMP), which may be updated periodically, and performance of the following items outlined in the minimum control measures (MCM) 1 through 6:

MCM #1 – Public Education and Outreach on Storm Water Impacts

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Education and Outreach activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- County will develop Public Education materials for County and Township use. These may include a brochure on the newly developed Storm Water District, Erosion Control Factsheets, Post Construction Factsheets and a County Public Education Factsheet. The County will also develop and maintain a webpage with links to these brochures along with other information
- As per the Storm water management program, the County will work with LCPIPE to prepare a public education plan each year which will provide education on a new storm water message each year while using more than one mechanism to get the message across. The County will target 50% of the population during each permit term (5 years).

Township Responsibility:

- Townships will need to make the Factsheets developed by County available at Township Halls and other Township public meeting places.
- The Storm Water District Brochure has already been printed by the County, Townships will need to keep them available to the public at township halls and other township public meeting places.
- Provide link to County Storm Water district Website on Township Websites, if in existence.
- Forward Webinar promotion information to township employees
- Follow LCPIPE prepared public education plan in conjunction with County
- Track number of educational materials distributed and report numbers back to County at end of each year.

MCM #2 – Public Involvement / Participation

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Involvement/Participation activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The County is responsible for the development of Public Involvement and Participation activities which may include:
    - Storm Water Advisory Committee (SWAC)
    - Lorain County Public Involvement and Public Education (LCPIPE) Work Group
    - Solid and Hazardous Waste Disposal
    - Lorain County Pride Day

- Lorain County Adopt a Highway Program
- The County will develop an annual public involvement and participation plan which will include a minimum of 1 event per year.

Township Responsibility:

- Townships are responsible to make sure that Involvement activities are advertised to Township employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Illicit Discharge Detection & Elimination activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Assist Townships with inventory of the current practices associated with Illicit Discharge Detection & Elimination Program (IDDE) within the Townships
- Based on the inventory of current practices the County will develop an Illicit Discharge Detection & Elimination (IDDE) Program that will include the following components: (a) mapping the MS4 and its outfalls (with annual updates), (b) mapping the location of home sewage treatment systems (HSTSs) that discharge to the MS4 and compiling a list of addresses of those systems, (c) performing dry weather screening of all outfalls by the end of the current permit term, (d) developing an enforcement protocol and elimination plan for illicit discharges discovered during dry weather screening and other detection means, and (e) educating public employees, businesses and the general public to identify and report illicit discharges. Responsible parties for each of the components will be outlined in the IDDE Program.
- Assist Townships to perform dry weather screening of outfalls in MS4s consistent with the SWMP.

Township Responsibility:

- Pass resolution to prohibit Illicit Discharge if not already completed.
- Assist County in collection and inventory of current IDDE practices including providing information on:
  - MS4 Outfalls (location and screening)
  - MS4 Mapping information as necessary for County to develop comprehensive storm sewer system map
    - showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins,

pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County to perform dry weather screening of outfalls within the Township. The County will create a program outlining requirements and developing standard forms. The Townships will then need to use those forms to perform a dry weather screening of their outfalls.
- Inform township employees, businesses and general public of educational opportunities relating to illicit discharge.

MCM #4 – Construction Site Storm Water Runoff Control

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Construction Site Storm Water Runoff Control activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Construction Site Erosion Control regulations that have been implemented and which must be followed by all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Target 1 site inspection per site per month at active construction sites or develop alternative inspection schedule based on the status of construction activities at the site.
- Follow enforcement escalation plan outlined in the regulations.

Township Responsibility:

- Comply with Construction Site Erosion Control Regulations
- Report known violations to Lorain County

MCM #5 – Post Construction Storm Water Management

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Post Construction Storm Water Management activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County

Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.

- Perform as-built inspections
- Provide maintenance of County owned BMP's.

Township Responsibility:

- Comply with Post Construction Storm Water Regulations
- Report known violations to Lorain County
- Provide maintenance of Township owned BMP's.

MCM #6 – Pollution Prevention / Good Housekeeping

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Pollution Prevention/Good Housekeeping activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Lorain County has developed a generic Operation and Maintenance Manual that can be used by the Townships. This manual will be updated by the County in 2012 and provided to the Townships.
- Create Storm Water Pollution Prevention Plans (SWP3) for Township Facilities under the Ohio EPA MS4 permit coverage. Facilities subject to the permit are listed in the SWMP

Township Responsibility:

- Expand upon and implement O & M manual for specific Township Facilities. These manuals must be updated for township facilities by the end of 2013.
- Implement and follow SWP3 for Township Facilities
- Perform annual comprehensive site evaluation, as required
- Ensure Township Employees receive required training
- Log employee training hours
- Provide year end reporting to County

Lorain County will actively work to provide compliance with the EPA NPDES minimum control measures for which it is responsible as part of the MOU. However, the Township agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Township's responsibility to ensure compliance and maintain liability for said compliance pursuant to Ohio EPA NPDES permit No.: OHQ000002 Part III.C.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 3/28/13

BOARD OF TRUSTEES OF Columbia TOWNSHIP

By: _____

Date: 11/19/12

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the Board of Trustees of EATON Township (Township) on the date set forth below.

Recitals

WHEREAS, both the County and Township are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and MS4 Designated Townships collectively to coordinate and collaborate on compliance with the permit requirements; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through compliance with the Lorain County Storm Water District Storm Water Management Program (SWMP), which may be updated periodically, and performance of the following items outlined in the minimum control measures (MCM) 1 through 6:

MCM #1 – Public Education and Outreach on Storm Water Impacts

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Education and Outreach activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- County will develop Public Education materials for County and Township use. These may include a brochure on the newly developed Storm Water District, Erosion Control Factsheets, Post Construction Factsheets and a County Public Education Factsheet. The County will also develop and maintain a webpage with links to these brochures along with other information
- As per the Storm water management program, the County will work with LCPIPE to prepare a public education plan each year which will provide education on a new storm water message each year while using more than one mechanism to get the message across. The County will target 50% of the population during each permit term (5 years).

Township Responsibility:

- Townships will need to make the Factsheets developed by County available at Township Halls and other Township public meeting places.
- The Storm Water District Brochure has already been printed by the County, Townships will need to keep them available to the public at township halls and other township public meeting places.
- Provide link to County Storm Water district Website on Township Websites, if in existence.
- Forward Webinar promotion information to township employees
- Follow LCPIPE prepared public education plan in conjunction with County
- Track number of educational materials distributed and report numbers back to County at end of each year.

MCM #2 – Public Involvement / Participation

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Involvement/Participation activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The County is responsible for the development of Public Involvement and Participation activities which may include:
    - Storm Water Advisory Committee (SWAC)
    - Lorain County Public Involvement and Public Education (LCPIPE) Work Group
    - Solid and Hazardous Waste Disposal
    - Lorain County Pride Day

    - Lorain County Adopt a Highway Program
- The County will develop an annual public involvement and participation plan which will include a minimum of 1 event per year.

Township Responsibility:

- Townships are responsible to make sure that Involvement activities are advertised to Township employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Illicit Discharge Detection & Elimination activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Assist Townships with inventory of the current practices associated with Illicit Discharge Detection & Elimination Program (IDDE) within the Townships
- Based on the inventory of current practices the County will develop an Illicit Discharge Detection & Elimination (IDDE) Program that will include the following components: (a) mapping the MS4 and its outfalls (with annual updates), (b) mapping the location of home sewage treatment systems (HSTSs) that discharge to the MS4 and compiling a list of addresses of those systems, (c) performing dry weather screening of all outfalls by the end of the current permit term, (d) developing an enforcement protocol and elimination plan for illicit discharges discovered during dry weather screening and other detection means, and (e) educating public employees, businesses and the general public to identify and report illicit discharges. Responsible parties for each of the components will be outlined in the IDDE Program.
- Assist Townships to perform dry weather screening of outfalls in MS4s consistent with the SWMP.

Township Responsibility:

- Pass resolution to prohibit Illicit Discharge if not already completed.
- Assist County in collection and inventory of current IDDE practices including providing information on:
    - MS4 Outfalls (location and screening)
    - MS4 Mapping information as necessary for County to develop comprehensive storm sewer system map
        - showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins,

pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County to perform dry weather screening of outfalls within the Township. The County will create a program outlining requirements and developing standard forms. The Townships will then need to use those forms to perform a dry weather screening of their outfalls.
- Inform township employees, businesses and general public of educational opportunities relating to illicit discharge.

MCM #4 – Construction Site Storm Water Runoff Control

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Construction Site Storm Water Runoff Control activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Construction Site Erosion Control regulations that have been implemented and which must be followed by all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Target 1 site inspection per site per month at active construction sites or develop alternative inspection schedule based on the status of construction activities at the site.
- Follow enforcement escalation plan outlined in the regulations.

Township Responsibility:

- Comply with Construction Site Erosion Control Regulations
- Report known violations to Lorain County

MCM #5 – Post Construction Storm Water Management

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Post Construction Storm Water Management activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County

Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.

- Perform as-built inspections
- Provide maintenance of County owned BMP's.

Township Responsibility:

- Comply with Post Construction Storm Water Regulations
- Report known violations to Lorain County
- Provide maintenance of Township owned BMP's.

MCM #6 – Pollution Prevention / Good Housekeeping

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Pollution Prevention/Good Housekeeping activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Lorain County has developed a generic Operation and Maintenance Manual that can be used by the Townships. This manual will be updated by the County in 2012 and provided to the Townships.
- Create Storm Water Pollution Prevention Plans (SWP3) for Township Facilities under the Ohio EPA MS4 permit coverage. Facilities subject to the permit are listed in the SWMP

Township Responsibility:

- Expand upon and implement O & M manual for specific Township Facilities. These manuals must be updated for township facilities by the end of 2013.
- Implement and follow SWP3 for Township Facilities
- Perform annual comprehensive site evaluation, as required
- Ensure Township Employees receive required training
- Log employee training hours
- Provide year end reporting to County

Lorain County will actively work to provide compliance with the EPA NPDES minimum control measures for which it is responsible as part of the MOU. However, the Township agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Township's responsibility to ensure compliance and maintain liability for said compliance pursuant to Ohio EPA NPDES permit No.: OHQ000002 Part III.C.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 3/28/13

BOARD OF TRUSTEES OF EATON TOWNSHIP

By: _____

Date: 11/6/12

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the Board of Trustees of Elyria Township (Township) on the date set forth below.

Recitals

WHEREAS, both the County and Township are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and MS4 Designated Townships collectively to coordinate and collaborate on compliance with the permit requirements; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through compliance with the Lorain County Storm Water District Storm Water Management Program (SWMP), which may be updated periodically, and performance of the following items outlined in the minimum control measures (MCM) 1 through 6:

MCM #1 – Public Education and Outreach on Storm Water Impacts

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Education and Outreach activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- County will develop Public Education materials for County and Township use. These may include a brochure on the newly developed Storm Water District, Erosion Control Factsheets, Post Construction Factsheets and a County Public Education Factsheet. The County will also develop and maintain a webpage with links to these brochures along with other information
- As per the Storm water management program, the County will work with LCPIPE to prepare a public education plan each year which will provide education on a new storm water message each year while using more than one mechanism to get the message across. The County will target 50% of the population during each permit term (5 years).

Township Responsibility:

- Townships will need to make the Factsheets developed by County available at Township Halls and other Township public meeting places.
- The Storm Water District Brochure has already been printed by the County, Townships will need to keep them available to the public at township halls and other township public meeting places.
- Provide link to County Storm Water district Website on Township Websites, if in existence.
- Forward Webinar promotion information to township employees
- Follow LCPIPE prepared public education plan in conjunction with County
- Track number of educational materials distributed and report numbers back to County at end of each year.

MCM #2 – Public Involvement / Participation

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Involvement/Participation activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The County is responsible for the development of Public Involvement and Participation activities which may include:
    - Storm Water Advisory Committee (SWAC)
    - Lorain County Public Involvement and Public Education (LCPIPE) Work Group
    - Solid and Hazardous Waste Disposal
    - Lorain County Pride Day

- Lorain County Adopt a Highway Program
- The County will develop an annual public involvement and participation plan which will include a minimum of 1 event per year.

Township Responsibility:

- Townships are responsible to make sure that Involvement activities are advertised to Township employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Illicit Discharge Detection & Elimination activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Assist Townships with inventory of the current practices associated with Illicit Discharge Detection & Elimination Program (IDDE) within the Townships.
- Based on the inventory of current practices the County will develop an Illicit Discharge Detection & Elimination (IDDE) Program that will include the following components: (a) mapping the MS4 and its outfalls (with annual updates), (b) mapping the location of home sewage treatment systems (HSTSs) that discharge to the MS4 and compiling a list of addresses of those systems, (c) performing dry weather screening of all outfalls by the end of the current permit term, (d) developing an enforcement protocol and elimination plan for illicit discharges discovered during dry weather screening and other detection means, and (e) educating public employees, businesses and the general public to identify and report illicit discharges. Responsible parties for each of the components will be outlined in the IDDE Program.
- Assist Townships to perform dry weather screening of outfalls in MS4s consistent with the SWMP.

Township Responsibility:

- Pass resolution to prohibit Illicit Discharge if not already completed.
- Assist County in collection and inventory of current IDDE practices including providing information on:
  - MS4 Outfalls (location and screening).
  - MS4 Mapping information as necessary for County to develop comprehensive storm sewer system map
    - showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins,

pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County to perform dry weather screening of outfalls within the Township. The County will create a program outlining requirements and developing standard forms. The Townships will then need to use those forms to perform a dry weather screening of their outfalls.
- Inform township employees, businesses and general public of educational opportunities relating to illicit discharge.

MCM #4 – Construction Site Storm Water Runoff Control

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Construction Site Storm Water Runoff Control activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Construction Site Erosion Control regulations that have been implemented and which must be followed by all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Target 1 site inspection per site per month at active construction sites or develop alternative inspection schedule based on the status of construction activities at the site.
- Follow enforcement escalation plan outlined in the regulations.

Township Responsibility:

- Comply with Construction Site Erosion Control Regulations
- Report known violations to Lorain County

MCM #5 – Post Construction Storm Water Management

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Post Construction Storm Water Management activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County

Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Perform as-built inspections.
- Provide maintenance of County owned BMP's.

Township Responsibility:
- Comply with Post Construction Storm Water Regulations
- Report known violations to Lorain County
- Provide maintenance of Township owned BMP's.

MCM #6 – Pollution Prevention / Good Housekeeping

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Pollution Prevention/Good Housekeeping activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:
- Lorain County has developed a generic Operation and Maintenance Manual that can be used by the Townships. This manual will be updated by the County in 2012 and provided to the Townships.
- Create Storm Water Pollution Prevention Plans (SWP3) for Township Facilities under the Ohio EPA MS4 permit coverage. Facilities subject to the permit are listed in the SWMP

Township Responsibility:
- Expand upon and implement O & M manual for specific Township Facilities. These manuals must be updated for township facilities by the end of 2013.
- Implement and follow SWP3 for Township Facilities
- Perform annual comprehensive site evaluation, as required
- Ensure Township Employees receive required training
- Log employee training hours
- Provide year end reporting to County

Lorain County will actively work to provide compliance with the EPA NPDES minimum control measures for which it is responsible as part of the MOU. However, the Township agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Township's responsibility to ensure compliance and maintain liability for said compliance pursuant to Ohio EPA NPDES permit No.: OHQ000002 Part III.C.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 3/28/13

BOARD OF TRUSTEES OF Elyria TOWNSHIP

By: _____
William Holtzman, Trustee

Date: 3/27/2013

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the Board of Trustees of GRAFTON Township (Township) on the date set forth below.

Recitals

WHEREAS, both the County and Township are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and MS4 Designated Townships collectively to coordinate and collaborate on compliance with the permit requirements; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through compliance with the Lorain County Storm Water District Storm Water Management Program (SWMP), which may be updated periodically, and performance of the following items outlined in the minimum control measures (MCM) 1 through 6:

MCM #1 – Public Education and Outreach on Storm Water Impacts

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Education and Outreach activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- County will develop Public Education materials for County and Township use. These may include a brochure on the newly developed Storm Water District, Erosion Control Factsheets, Post Construction Factsheets and a County Public Education Factsheet. The County will also develop and maintain a webpage with links to these brochures along with other information
- As per the Storm water management program, the County will work with LCPIPE to prepare a public education plan each year which will provide education on a new storm water message each year while using more than one mechanism to get the message across. The County will target 50% of the population during each permit term (5 years).

Township Responsibility:

- Townships will need to make the Factsheets developed by County available at Township Halls and other Township public meeting places.
- The Storm Water District Brochure has already been printed by the County, Townships will need to keep them available to the public at township halls and other township public meeting places.
- Provide link to County Storm Water district Website on Township Websites, if in existence.
- Forward Webinar promotion information to township employees
- Follow LCPIPE prepared public education plan in conjunction with County
- Track number of educational materials distributed and report numbers back to County at end of each year.

MCM #2 – Public Involvement / Participation

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Involvement/Participation activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The County is responsible for the development of Public Involvement and Participation activities which may include:
    - Storm Water Advisory Committee (SWAC)
    - Lorain County Public Involvement and Public Education (LCPIPE) Work Group
    - Solid and Hazardous Waste Disposal
    - Lorain County Pride Day

    - Lorain County Adopt a Highway Program
- The County will develop an annual public involvement and participation plan which will include a minimum of 1 event per year.

Township Responsibility:

- Townships are responsible to make sure that Involvement activities are advertised to Township employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Illicit Discharge Detection & Elimination activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Assist Townships with inventory of the current practices associated with Illicit Discharge Detection & Elimination Program (IDDE) within the Townships
- Based on the inventory of current practices the County will develop an Illicit Discharge Detection & Elimination (IDDE) Program that will include the following components: (a) mapping the MS4 and its outfalls (with annual updates), (b) mapping the location of home sewage treatment systems (HSTSs) that discharge to the MS4 and compiling a list of addresses of those systems, (c) performing dry weather screening of all outfalls by the end of the current permit term, (d) developing an enforcement protocol and elimination plan for illicit discharges discovered during dry weather screening and other detection means, and (e) educating public employees, businesses and the general public to identify and report illicit discharges. Responsible parties for each of the components will be outlined in the IDDE Program.
- Assist Townships to perform dry weather screening of outfalls in MS4s consistent with the SWMP.

Township Responsibility:

- Pass resolution to prohibit Illicit Discharge if not already completed.
- Assist County in collection and inventory of current IDDE practices including providing information on:
    - MS4 Outfalls (location and screening)
    - MS4 Mapping information as necessary for County to develop comprehensive storm sewer system map
        - showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins,

pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County to perform dry weather screening of outfalls within the Township. The County will create a program outlining requirements and developing standard forms. The Townships will then need to use those forms to perform a dry weather screening of their outfalls.
- Inform township employees, businesses and general public of educational opportunities relating to illicit discharge.

MCM #4 – Construction Site Storm Water Runoff Control

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Construction Site Storm Water Runoff Control activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Construction Site Erosion Control regulations that have been implemented and which must be followed by all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Target 1 site inspection per site per month at active construction sites or develop alternative inspection schedule based on the status of construction activities at the site.
- Follow enforcement escalation plan outlined in the regulations.

Township Responsibility:

- Comply with Construction Site Erosion Control Regulations
- Report known violations to Lorain County

MCM #5 – Post Construction Storm Water Management

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Post Construction Storm Water Management activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County

Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.

- Perform as-built inspections
- Provide maintenance of County owned BMP's.

Township Responsibility:

- Comply with Post Construction Storm Water Regulations
- Report known violations to Lorain County
- Provide maintenance of Township owned BMP's.

MCM #6 – Pollution Prevention / Good Housekeeping

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Pollution Prevention/Good Housekeeping activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Lorain County has developed a generic Operation and Maintenance Manual that can be used by the Townships. This manual will be updated by the County in 2012 and provided to the Townships.
- Create Storm Water Pollution Prevention Plans (SWP3) for Township Facilities under the Ohio EPA MS4 permit coverage. Facilities subject to the permit are listed in the SWMP

Township Responsibility:

- Expand upon and implement O & M manual for specific Township Facilities. These manuals must be updated for township facilities by the end of 2013.
- Implement and follow SWP3 for Township Facilities
- Perform annual comprehensive site evaluation, as required
- Ensure Township Employees receive required training
- Log employee training hours
- Provide year end reporting to County

Lorain County will actively work to provide compliance with the EPA NPDES minimum control measures for which it is responsible as part of the MOU. However, the Township agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Township's responsibility to ensure compliance and maintain liability for said compliance pursuant to Ohio EPA NPDES permit No.: OHQ000002 Part III.C.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 3/28/13

BOARD OF TRUSTEES OF GRAFTON TOWNSHIP

By: _____

Date: 11-19-2012

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the Board of Trustees of Henrietta Township (Township) on the date set forth below.

Recitals

WHEREAS, both the County and Township are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and MS4 Designated Townships collectively to coordinate and collaborate on compliance with the permit requirements; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through compliance with the Lorain County Storm Water District Storm Water Management Program (SWMP), which may be updated periodically, and performance of the following items outlined in the minimum control measures (MCM) 1 through 6:

MCM #1 – Public Education and Outreach on Storm Water Impacts

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Education and Outreach activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- County will develop Public Education materials for County and Township use. These may include a brochure on the newly developed Storm Water District, Erosion Control Factsheets, Post Construction Factsheets and a County Public Education Factsheet. The County will also develop and maintain a webpage with links to these brochures along with other information
- As per the Storm water management program, the County will work with LCPIPE to prepare a public education plan each year which will provide education on a new storm water message each year while using more than one mechanism to get the message across. The County will target 50% of the population during each permit term (5 years).

Township Responsibility:

- Townships will need to make the Factsheets developed by County available at Township Halls and other Township public meeting places.
- The Storm Water District Brochure has already been printed by the County, Townships will need to keep them available to the public at township halls and other township public meeting places.
- Provide link to County Storm Water district Website on Township Websites, if in existence.
- Forward Webinar promotion information to township employees
- Follow LCPIPE prepared public education plan in conjunction with County
- Track number of educational materials distributed and report numbers back to County at end of each year.

MCM #2 – Public Involvement / Participation

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Involvement/Participation activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The County is responsible for the development of Public Involvement and Participation activities which may include:
    - Storm Water Advisory Committee (SWAC)
    - Lorain County Public Involvement and Public Education (LCPIPE) Work Group
    - Solid and Hazardous Waste Disposal
    - Lorain County Pride Day

    - Lorain County Adopt a Highway Program
- The County will develop an annual public involvement and participation plan which will include a minimum of 1 event per year.

Township Responsibility:

- Townships are responsible to make sure that Involvement activities are advertised to Township employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Illicit Discharge Detection & Elimination activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Assist Townships with inventory of the current practices associated with Illicit Discharge Detection & Elimination Program (IDDE) within the Townships
- Based on the inventory of current practices the County will develop an Illicit Discharge Detection & Elimination (IDDE) Program that will include the following components: (a) mapping the MS4 and its outfalls (with annual updates), (b) mapping the location of home sewage treatment systems (HSTSs) that discharge to the MS4 and compiling a list of addresses of those systems, (c) performing dry weather screening of all outfalls by the end of the current permit term, (d) developing an enforcement protocol and elimination plan for illicit discharges discovered during dry weather screening and other detection means, and (e) educating public employees, businesses and the general public to identify and report illicit discharges. Responsible parties for each of the components will be outlined in the IDDE Program.
- Assist Townships to perform dry weather screening of outfalls in MS4s consistent with the SWMP.

Township Responsibility:

- Pass resolution to prohibit Illicit Discharge if not already completed.
- Assist County in collection and inventory of current IDDE practices including providing information on:
    - MS4 Outfalls (location and screening)
    - MS4 Mapping information as necessary for County to develop comprehensive storm sewer system map
        - showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins,

pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County to perform dry weather screening of outfalls within the Township. The County will create a program outlining requirements and developing standard forms. The Townships will then need to use those forms to perform a dry weather screening of their outfalls.
- Inform township employees, businesses and general public of educational opportunities relating to illicit discharge.

MCM #4 – Construction Site Storm Water Runoff Control

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Construction Site Storm Water Runoff Control activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Construction Site Erosion Control regulations that have been implemented and which must be followed by all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Target 1 site inspection per site per month at active construction sites or develop alternative inspection schedule based on the status of construction activities at the site.
- Follow enforcement escalation plan outlined in the regulations.

Township Responsibility:

- Comply with Construction Site Erosion Control Regulations
- Report known violations to Lorain County

MCM #5 – Post Construction Storm Water Management

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Post Construction Storm Water Management activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County

Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.

- Perform as-built inspections
- Provide maintenance of County owned BMP's.

Township Responsibility:

- Comply with Post Construction Storm Water Regulations
- Report known violations to Lorain County
- Provide maintenance of Township owned BMP's.

MCM #6 – Pollution Prevention / Good Housekeeping

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Pollution Prevention/Good Housekeeping activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Lorain County has developed a generic Operation and Maintenance Manual that can be used by the Townships. This manual will be updated by the County in 2012 and provided to the Townships.
- Create Storm Water Pollution Prevention Plans (SWP3) for Township Facilities under the Ohio EPA MS4 permit coverage. Facilities subject to the permit are listed in the SWMP

Township Responsibility:

- Expand upon and implement O & M manual for specific Township Facilities. These manuals must be updated for township facilities by the end of 2013.
- Implement and follow SWP3 for Township Facilities
- Perform annual comprehensive site evaluation, as required
- Ensure Township Employees receive required training
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- Provide year end reporting to County

Lorain County will actively work to provide compliance with the EPA NPDES minimum control measures for which it is responsible as part of the MOU. However, the Township agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Township's responsibility to ensure compliance and maintain liability for said compliance pursuant to Ohio EPA NPDES permit No.: OHQ000002 Part III.C.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 11-15-16

BOARD OF TRUSTEES OF HENRIETTA TOWNSHIP

By: _____

Date: 11-10-16

027-2012 Resolution

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the Board of Trustees of Sheffield Township (Township) on the date set forth below.

Recitals

WHEREAS, both the County and Township are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and MS4 Designated Townships collectively to coordinate and collaborate on compliance with the permit requirements; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through compliance with the Lorain County Storm Water District Storm Water Management Program (SWMP), which may be updated periodically, and performance of the following items outlined in the minimum control measures (MCM) 1 through 6:

MCM #1 – Public Education and Outreach on Storm Water Impacts

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Education and Outreach activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- County will develop Public Education materials for County and Township use. These may include a brochure on the newly developed Storm Water District, Erosion Control Factsheets, Post Construction Factsheets and a County Public Education Factsheet. The County will also develop and maintain a webpage with links to these brochures along with other information
- As per the Storm water management program, the County will work with LCPIPE to prepare a public education plan each year which will provide education on a new storm water message each year while using more than one mechanism to get the message across. The County will target 50% of the population during each permit term (5 years).

Township Responsibility:

- Townships will need to make the Factsheets developed by County available at Township Halls and other Township public meeting places.
- The Storm Water District Brochure has already been printed by the County, Townships will need to keep them available to the public at township halls and other township public meeting places.
- Provide link to County Storm Water district Website on Township Websites, if in existence.
- Forward Webinar promotion information to township employees
- Follow LCPIPE prepared public education plan in conjunction with County
- Track number of educational materials distributed and report numbers back to County at end of each year.

MCM #2 – Public Involvement / Participation

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Public Involvement/Participation activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The County is responsible for the development of Public Involvement and Participation activities which may include:
    - Storm Water Advisory Committee (SWAC)
    - Lorain County Public Involvement and Public Education (LCPIPE) Work Group
    - Solid and Hazardous Waste Disposal
    - Lorain County Pride Day

- Lorain County Adopt a Highway Program
- The County will develop an annual public involvement and participation plan which will include a minimum of 1 event per year.

Township Responsibility:

- Townships are responsible to make sure that Involvement activities are advertised to Township employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Illicit Discharge Detection & Elimination activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Assist Townships with inventory of the current practices associated with Illicit Discharge Detection & Elimination Program (IDDE) within the Townships
- Based on the inventory of current practices the County will develop an Illicit Discharge Detection & Elimination (IDDE) Program that will include the following components: (a) mapping the MS4 and its outfalls (with annual updates), (b) mapping the location of home sewage treatment systems (HSTSs) that discharge to the MS4 and compiling a list of addresses of those systems, (c) performing dry weather screening of all outfalls by the end of the current permit term, (d) developing an enforcement protocol and elimination plan for illicit discharges discovered during dry weather screening and other detection means, and (e) educating public employees, businesses and the general public to identify and report illicit discharges. Responsible parties for each of the components will be outlined in the IDDE Program.
- Assist Townships to perform dry weather screening of outfalls in MS4s consistent with the SWMP.

Township Responsibility:

- Pass resolution to prohibit Illicit Discharge if not already completed.
- Assist County in collection and inventory of current IDDE practices including providing information on:
  - MS4 Outfalls (location and screening)
  - MS4 Mapping information as necessary for County to develop comprehensive storm sewer system map
    - showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins,

pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County to perform dry weather screening of outfalls within the Township. The County will create a program outlining requirements and developing standard forms. The Townships will then need to use those forms to perform a dry weather screening of their outfalls.
- Inform township employees, businesses and general public of educational opportunities relating to illicit discharge.

MCM #4 – Construction Site Storm Water Runoff Control

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Construction Site Storm Water Runoff Control activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Construction Site Erosion Control regulations that have been implemented and which must be followed by all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.
- Target 1 site inspection per site per month at active construction sites or develop alternative inspection schedule based on the status of construction activities at the site.
- Follow enforcement escalation plan outlined in the regulations.

Township Responsibility:

- Comply with Construction Site Erosion Control Regulations
- Report known violations to Lorain County

MCM #5 – Post Construction Storm Water Management

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Post Construction Storm Water Management activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with construction activities where the larger common plan of development or sale disturbs 1 or more acres of land. The County

Commissioners have granted to the Storm Water District and per the Storm Water District Bylaws to the District Director, responsibility to administer the regulations and ensure compliance.

- Perform as-built inspections
- Provide maintenance of County owned BMP's.

Township Responsibility:

- Comply with Post Construction Storm Water Regulations
- Report known violations to Lorain County
- Provide maintenance of Township owned BMP's.

MCM #6 – Pollution Prevention / Good Housekeeping

Refer to the Lorain County Storm Water District Storm Water Management Program (SWMP) for details on complete Pollution Prevention/Good Housekeeping activities and responsibilities, specific responsibilities for the County and Townships are outlined below:

County Responsibility:

- Lorain County has developed a generic Operation and Maintenance Manual that can be used by the Townships. This manual will be updated by the County in 2012 and provided to the Townships.
- Create Storm Water Pollution Prevention Plans (SWP3) for Township Facilities under the Ohio EPA MS4 permit coverage. Facilities subject to the permit are listed in the SWMP

Township Responsibility:

- Expand upon and implement O & M manual for specific Township Facilities. These manuals must be updated for township facilities by the end of 2013.
- Implement and follow SWP3 for Township Facilities
- Perform annual comprehensive site evaluation, as required
- Ensure Township Employees receive required training
- Log employee training hours
- Provide year end reporting to County

Lorain County will actively work to provide compliance with the EPA NPDES minimum control measures for which it is responsible as part of the MOU. However, the Township agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Township's responsibility to ensure compliance and maintain liability for said compliance pursuant to Ohio EPA NPDES permit No.: OHQ000002 Part III.C.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 3/28/13

BOARD OF TRUSTEES OF Sheffield TOWNSHIP

By: _____
David Newsome, Chairman

Date: 11-19-2012

RESOLUTION NO. 10-418

A.13

In the matter of approving and entering into MOU's with the Townships of Grafton, Eaton, Columbia, Carlisle, Elyria, Sheffield and Amherst pursuant to Clean Water Act, Ohio EPA Phase II Program designating entities to develop and implement a program to detect and eliminate illicit discharges

June 23, 2010

BE IT RESOLVED, by the Lorain County Board of Commissioners that we hereby approve & enter into MOU's with the Townships of Grafton, Eaton, Columbia, Carlisle, Elyria, Sheffield and Amherst pursuant to Clean Water Act, Ohio EPA Phase II Program designating entities to develop and implement a program to detect and eliminate illicit discharges.

Said MOU's are considered a part hereof to this resolution by as follows and can be found on file in the Commissioners/Purchasing/Township Office;

This Agreement entered into by and between the Board of Commissioners of Lorain County, Ohio (COUNTY) and the Board of Trustees of Township (TOWNSHIP)

WHEREAS, pursuant to the Clean Water Act, Ohio EPA Phase II program requires Phase II designated entities to develop and implement a program to detect and eliminate illicit discharges; and

WHEREAS, the COUNTY and TOWNSHIP DESIRE TO COLLABORATE EFFORTS TO COMPLY WITH Phase II requirements.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained, the parties hereto agree as follows:

1.0 PLEDGE OF COOPERATION

Understanding that the current economic conditions severely restrict the funding and other resources available to local government, the parties hereto desire to collaborate their efforts to comply with Phase II mandates regarding the regulation if illicit discharge so as to use funding so as to avoid duplication and be economically efficient.

COUNTY agrees to dedicate its personnel and departments to assist and work in conjunction with the TOWNSHIP to fulfill the goals set forth hereafter. This will include the office so he Lorain County Engineer, Lorain County Auditor, Lorain County Health Department, Lorain County Community Development, Lorain County Soil & Water, Lorain County Emergency management and Lorain County Prosecuting Attorney.

TOWNSHIP agrees to dedicate its personnel and departments to assist and work in conjunction with the COUNTY to fulfill the goals set for hereafter. This will include the Township Zoning Inspector and Zoning boards, the Road Superintendent and Road Department, and all other administrative staff.

2.0 DETECTION AND ELIMINATION OF ELICIT DISCHARGES

COUNTY and TOWNSHIP shall use their best efforts, to the extent permitted by available funding, to achieve the detection and elimination of eliolt discharges by implementing the following programs.

2.1 Conduct public education on illicit discharges
Employees, businesses and the general public will be informed of the hazards associated with illicit discharges and the improper disposal of waste. This will be accomplished through public programs and distribution literature. The County Soil & Water is currently accomplishing this through its PIPE program, and video the County Health Department has produced and broadcasts videos. The TOWNSHIP circulates information through newsletters and postings at Township buildings.

2.2 Enactment of illicit discharge regulations
COUNTY and TONWSHIP are in the process of and will forthwith enact regulations prohibiting illicit discharges in their respective jurisdictions.

2.3 Detection of illicit discharges
COUNTY and TOWNSHP are currently identifying illicit discharge locations. The County Health Department is identifying home sewage treatment systems. TOWNSHIP road personnel and administrative staff are locating outfalls. The information gathered will be submitted to the Lorain County Engineer and Auditor to prepare a map of the MS4 system.
The parties will strive to update the map annually with the objective of identifying by 2014, all storm sewers, ditches, catch basins, publicly owned storm water management structures and all privately owned post construction BMP's installed since April 21, 2003.

2.4 Inspection of
COUNTY and TOWNSHIP will cooperate in field surveys and inspections of outfalls and home sewage systems for detection of illicit discharges. Documentation and repots regarding the inspections will be shared with each other, as well as OHIO EPA. Dry weather screening of all outfalls is to occur by 2014.
Upon location of an illicit discharge, steps will be taken in accordance with the local regulations adopted pursuant to Section 2.2, to eliminate the illicit discharge by the owner.

2.5 Enforcement
In the event voluntary remediation by the owner is not accomplished in a timely manner, referral will be made to the Lorain County Prosecuting Attorney. The Prosecuting Attorney shall proceed with all remedies allowable by law including civil injunction and/or criminal prosecution necessary to obtain compliance with the Clean Water Act.

2.6 Best Management Practices
COUNTY and TOWNSHIP shall implement Best Management Practices to avoid illicit discharges. This will include training and instruction to public employees, information to the general public, monitoring of private home sewage systems and implementation of reasonable protection from accidental discharge, including establishing measurable goals, when illicit discharges are detected.

Resolution No. 10-418 cont.

3.0 TERMINATION
This Agreement may be terminated by either party upon sixty (60) day written notice to the other party.

S/BOARD OF COMMISSIONER OF LORAIN COUNTY

S/BOARD OF TOWNSHP TRUSTEES

S/APPROVED AS TO FORM; Gerald A. Innes, Assistant County Prosecutor

Motion by Kalo, seconded by Kokoski to adopt Resolution. Ayes: Kalo & Kokoski / Absent: Blair had an appointment.
Motion carried. (discussion was held on the above)

I, Theresa L. Upton, Clerk to the Lorain County Board of Commissioners do hereby certify that the above Resolution No. 10-418 is a true copy as it appears in Journal No. 10 on date of June 23, 2010.

Theresa L. Upton, Clerk

ATTACHMENT E

FILE COPY

RESOLUTION NO. SWD-15-7

In the matter of approving and entering into)
A MOU with the City of Oberlin for) May 20, 2015
For stormwater services)

BE IT RESOLVED, by the Lorain County Stormwater Management District we hereby approve and enter into a MOU with the City of Oberlin for stormwater services.

FURTHER BE IT RESOLVED, City of Oberlin will become co-permittees under the NPDES.

BE IT FURTHER RESOLVED, said contract is considered a part hereof to this resolution by reference thereto and can be found on file in the Commissioners/Purchasing & Stormwater Office.

Motion by Lori Kokoski, seconded by Matt Lundy to adopt. Upon roll call the vote taken resulted: Ayes: All
Motion carried. _____(discussion was held on the above)

CERTIFICATE OF SECRETARY/TREASURER

I, hereby certify that the foregoing is a true and correct copy of Resolution No. SWD-15-7, adopted on the 20th day of May 2015.

Matt Lundy
Secretary/Treasurer

cc - Stormwater - Romancak
Lisa Hobart - Budget Director
K.E. Saunders - Purchasing

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water District (County) and the City of Oberlin (City) on the date set forth below.

Recitals

WHEREAS, both the County and City are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, the City has need of a Storm Water Utility Fee and Business Plan; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint development of a Storm Water Utility Fee and Business Plan as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in this venture using the following approach:

The County will utilize prior experience and the project team (Team) to assist the City in the implementation of a Storm Water Utility Program. Project team members are expected to include: Lorain County Storm Water Management Team and Storm Water Management District Consultants that assisted on the formation of the Lorain County Storm Water District.

Costs associated with said implementation will be paid upfront by the County with 100% reimbursement from the City to the County. Said payments shall begin with the earlier of completing the tasks contained within this MOU or September 30, 2014, with payments due quarterly. Should the City move forward with the Storm Water Utility Implementation, reimbursement will extend to a 3 year term paid annually with the first payment due 6 months following utility billing startup or June 1, 2016, whichever comes first (first collection date may be extended by mutual agreement of both parties). Payback to the County will be at 0% interest. The City will reimburse the County within 30 days of the date of each invoice. The City may, at its option repay the County at an accelerated rate with no penalty.

This MOU specifically covers Phase 1 of the City's Storm Water Utility Implementation. If at the conclusion of Phase 1, the City decides to join the Lorain County Storm Water District and both parties agree to the terms, repayment of the implementation costs noted herein may be waived.

Phase 2 of the City Storm Water Utility Implementation may be financed by the County under the same terms and conditions outlined herein or such terms and conditions that are found to be mutually agreeable.

Phase 1 of the program will:

1. Determine the level of service and cost of service required for the City of Oberlin.
2. Analyze the activities that could be performed by the County and compare cost of the County performing the activities versus the City performing said activities.
3. Determine the feasibility of including the City in the Lorain County Storm Water District.

The detailed scope for Phase 1 includes:

Task 1 – Data Collection and Kickoff Meeting

The purpose of this task is to solidify the Team's understanding of the City of Oberlin's goals for establishing a storm water utility program. The Team will draw on the knowledge and experience of City staff to develop a meaningful and useful scope. Specific subtasks include:

1.a **Initial Data Collection Questionnaire.** A data collection questionnaire will be developed and emailed to City staff. The questionnaire will assist both the Team and City Staff in organizing the data required for the project. The questionnaire will be emailed to City staff to kick off the project and allocate City staff time to collect most, if not all of the data prior to holding the kickoff conference call meeting.

1.b **Kickoff Conference Call.** A conference call meeting will be held with appropriate City staff to kickoff the project. The conference call meeting will assist both the Team and City Staff in reviewing, organizing and discussing the requested information in the questionnaire for said project.

Task 2 –Organize a Technical Advisory Committee (TAC)

2.a **Prepare and Hold TAC Meetings.** The Team will prepare and distribute meeting agendas and documents to be reviewed and discussed for (2) two on site TAC status meetings. The monthly TAC meetings will be used to review, present, discuss and develop draft program recommendations. The TAC meetings will vary in time length from 2 to 3 hours per meeting. The longer than usual meetings are required to minimize costs and maximize meeting time with City staff and the Team.

2.b **Prepare and Hold TAC Conference Call Meetings.** The Team will prepare and distribute (through e-mail) meeting agendas for telephone conference calls. We assume 3 TAC conference call meetings. The conference calls are used to minimize costs to follow up each TAC meeting.

Task Products:

1. The Team will prepare and distribute (through e-mail) on-site TAC meeting agendas.
2. The Team will prepare and distribute (through e-mail) telephone conference call TAC meeting agendas.
3. The Team will prepare and distribute (through e-mail) meeting minutes.

Task Assumptions:

1. The City will provide the meeting space for all on-site TAC meetings.
2. Conference calls will be the mode of operation for meetings to minimize costs.

Task 3 - Database Evaluation

Data analysis and review is expected to be one of the major components of Phase 1. Data analysis and review is necessary to determine that sufficient data is available to properly develop the storm water utility program business plan and billing file. The purpose of this task is to determine data availability, identify the repository(s), determine how to acquire all information and how relevant, pertinent, and legally defensible the City of Oberlin's data is for the storm water utility program, which is necessary and required for the completion of the project. A recommendation on the most efficient and effective use of available Geographic Information System (GIS) data and what additional steps may be required to use the data in a legally defensible manner will also be determined.

3.a Data Collection.

The Team will:

1. Receive and review any existing reports, databases, drawings, or other information necessary to understand the issues, problems, and opportunities of the City of Oberlin storm water utility program;

2. Receive and review a copy of the Lorain County Auditor's property tax record billing file that should include at a minimum, the following data fields of information. The Team will work with the Lorain County Auditor's office to determine the exact parcels located within the City of Oberlin:

    a) Property or parcel ID number (PIN);
    b) Property or parcel service address;
    c) Owner name;
    d) Owner mailing address;
    e) Jurisdictional location code (if not included as part of the property or parcel ID number field);
    f) Property dimensions and/or property size measurement;
    g) Any fields that have been created or developed that relate properties or parcels with like ownership (parent – child);
    h) Property or parcel land use codes and/or descriptions and a land use description table;
    i) Any fields of data that have been created or developed that relate properties or parcels to the GIS database (if other than property or parcel ID number);
    j) Any other fields of data that may assist in developing the storm water billing database file.

3. Subject to the Non-Disclosure and Confidentiality provision set forth hereinafter, receive and review a copy of the City of Oberlin's water, wastewater and refuse billing database file (in Microsoft Excel or Access format) that should include at a minimum, the following data fields of information:

    a) Billing account number;
    b) District number (if applicable);
    c) Services code (water, wastewater and solid waste);
    d) Property service address;
    e) Owner or tenant code;
    f) User name;
    g) Owner name, if other than the user;
    h) Billing address (if differs from service address);
    i) Any fields of data such as water and/or sewer meter size that may assist in determining the current land use for each billing account;
    j) Any other data fields that have been created or developed that may indicate the current land use for

each billing account;

k) Property or Parcel ID number (PIN) linking the City billing database file to the County Auditor's property tax billing database file or GIS parcel layer (if exists);
l) Land use classification used to assign billing units;
m) Class code (residential or non-residential) if applicable;
n) Any other data fields that have been created or developed that relate City billing accounts to the Lorain County Assessor's tax billing database file (if any exist);
o) Any fields of data that have been created or developed that relate billing accounts to the GIS parcel database (if any exist);

4. Receive and review a copy of the City of Oberlin GIS and/or Lorain County GIS parcel layer (shapefile), and all other layers that may be used to determine or develop the impervious area measurement for a property or parcel. A current copy of the City of Oberlin and/or Lorain County digital aerial photography should be included.

3.b **Data Conditions Analysis Policy Paper.** A data conditions policy (white) paper will be prepared to present the findings from the billing system data review.

Task Assumptions:

1. The City of Oberlin will supply all available cost information as well as assist in seeking out other sources of information as required.

Task Products:

1. The Data Conditions Policy Paper that will include:
   - An analysis of the current water, wastewater, refuse billing system data.
   - An analysis of the Lorain County Auditor's property tax billing database.
   - An analysis of the City or County GIS data.

Task 4 - Develop a Storm Water Strategic Business Plan

Implementing a successful storm water utility program requires developing a formal, flexible strategic business plan that provides guidance both now and in the future. The purpose of this task is to formulate a long-term strategic plan that is the basis for the "Storm Water Business Plan."

4.a **Discuss and Develop a Storm Water Utility Program Mission and Goal Statements.** The Team will develop a draft storm water utility program Mission Statement and Goal Statements and review with City staff for input.

4.b **Strategic Business Plan Paper.** The Team will document a strategic business plan paper in a policy paper document.

Task Products:

1. Strategic Business Plan Policy Paper.

Task 5 - Perform a Level of Service / Cost of Service Analysis

The Team will define a level of service / perform a cost of service analysis based on and consistent with the program mission statement and/or goal statements from the business plan.

5.a **Storm Water Functional Elements.** Based upon input from City staff through the data collection process, and from The Team's previous experience assisting other Ohio communities, a specific description of program elements will be developed and used to meet the storm water utility program. These program elements will include the following:

- Administration (including billing, collection and customer service costs)
- Maintenance
- Operations
- Planning
- Enforcement
- Regulatory
- Water Quantity
- Water Quality (NPDES Permit)
- Other Environmental Issues (CSO's and SSO's)
- Capital Improvements Program (CIP)
- Other

5.b **Identify "Required Minimum" Level of Services.** The Team will develop a "required minimum" level of service plan for the City of Oberlin Storm Water Utility Program for a five (5)-year period from 2013 through 2017.

5.c **Identify "Required Minimum" Cost of Services.** The Team will develop a "required minimum" cost of service plan for the City of Oberlin Storm Water Utility Program for a five (5)-year period from 2013 through 2017.

5.d **NPDES Permit Activities.** The Team will incorporate the City of Oberlin Storm Water Utility Program NPDES Permit plan and cost assumptions into the cost of service computer model. It will be the responsibility of the City to provide cost associated with the NPDES permit activities.

5.e **County/City Comparison.** As part of the cost analysis, the Team will perform a review of activities that could be managed by the County in conjunction with their storm water utility activities. A comparison of cost will be included with these activities to determine if it is cost effective to have these activities managed by the County. It is anticipated that costs associated with storm water quality (NPDES permit) may be managed by the County whereas costs associated with quantity (flood control, infrastructure maintenance, etc.) will be managed by the City.

Task Assumptions:

- It will be the responsibility of the City to provide cost associated with the flooding and drainage activities and costs.
- It will be the responsibility of the City to provide cost associated with the NPDES permit activities and costs.

Task Products:

1. Level of Service and Cost of Service Policy Paper that will include:
   - A five-year Cash Flow Analysis.
   - Five-year range of ERU rates.
   - An interactive Microsoft Excel™ model for the purpose of showing various iterations of the Level of Service / Cost of Service and resulting revised rates.

Task 6 – Range of Rate Analysis

The Team will develop and determine an estimate of rate ranges and the associated revenues for the minimum level of service cost of service analysis based on the results of Task 5 above.

6.a **Range of potential rates and revenue.** The Team will calculate a range of rates and revenues that will be required to meet the minimum level of service and cost of service.

Task Products:

1. A range of potential rates and revenues will be generated based on the minimum level of service / cost of service analysis.

Task 7 – City Council Presentation

7.a **Prepare City Council Presentation.** A formal PowerPoint™ presentation will be made to City Council on the storm water program implementation options and associated costs.

Task 8 – Executive Summary Final Report

8.a **Document and Prepare Draft Executive Summary Final Report.** The purpose of this task is to prepare a draft executive summary final report with conclusions and recommendations to City Staff in digital PDF format only.

8.b **Finalize Executive Summary Final Report.** The purpose of this task is to incorporate all city staff comments and prepare a final executive summary report and submit to City Staff in digital PDF format only.

Following the completion of the final report, the County and City will need to determine in what manner to move forward on implementation of the Storm Water Utility for the City. Options include some type of joint venture between the County and City with shared responsibilities or development of a completely separate storm water utility by the City. The outcome of this decision will determine Phase 2 tasks required to implement the storm water utility. Accordingly, Phase 2 tasks are not part of this MOU and will be developed in a separate MOU with associated costs.

The City's Responsibility:

1. Subject to the Non-Disclosure and Confidentiality provision set forth hereunder, furnish to the Team all existing records and reports, and other financial and billing information pertinent to the storm water management utility rate analysis at no cost to the Team. It shall be the City's responsibility to provide the Team this information as requested within a reasonable time frame and in an organized manner. The Team shall rely on this information as being complete and accurate.

2. Furnish the Team with office space, telephone, and proper work area when the Team is on-site.

3. Furnish to the City, assistance from the Legal Department, Finance/Accounting Department, Planning and the Utility staff, by providing and developing the information, statistics, etc., required for the purpose of this study.

4. Subject to the Non-Disclosure and Confidentiality provision set forth hereunder, the City will make its resources and data available to the Team. These resources include, but are not limited to: staff; studies; documents; policies (written and unwritten); strategies; etc.

5. The City accepts the process/method of "estimating" and/or "forecasting" the number of ERU's based on the data conditions analysis, for the needs analysis phase of the project.

Project Schedule:

It is anticipated that Phase 1 tasks can be completed within 4 months of authorization to proceed. This timeframe is dependent on timely responses and decision making from the City.

Non-Disclosure and Confidentiality

During the course of completing the work under this MOU, the agents and employees of the County and the Team may obtain confidential and privileged information and data from the City. Accordingly, and in order to ensure that said data and information remain privileged and confidential, the County, its employees and agents, and the Team, agree not to share, release, disclose, provide, or otherwise make available to any entity or person any such confidential or privileged information or data, or make any use thereof, other than in providing the task products and reports described in this MOU to the City, without the express written consent of the City.

Project Fee:

Phase 1: $31,000
Phase 2: TBD

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party. In the event this MOU is terminated, the City shall be responsible for only those costs incurred up to and including the date of termination. Upon receipt of a final invoice, the City shall pay any outstanding balance to the County with sixty (60) days.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 6/25/14

CITY OF OBERLIN:

By: _____
Eric Norenberg, City Manager

Date: June 6, 2014

Approved as to form:

By: _____
Jon D. Clark, Law Director

Date: 6/10/2014

RESOLUTION NO. SWD-18-5

In the matter of approving the MOU)
with the Village of South Amherst for)
the implementation, coordination and) August 21, 2018
collaboration on stormwater issues)
and permit requirements)

WHEREAS, Village of South Amherst Ordinance No. 1582-18, passed July 23, 2018 authorized Mayor to enter into a MOU with Lorain County Stormwater District to become storm water co-permittees under the National Pollutant discharge elimination system (NPDES) small municipal separate storm sewer system permit regulations of the OHEPA and declare an emergency.

NOW, THEREFORE BE IT RESOLVED, by the Lorain County Stormwater Management District we hereby approve the MOU with the Village of South Amherst for the implementation, coordination and collaboration on stormwater issues and permit requirements.

Said MOU is as follows:

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water Management District (County) and the Village of South Amherst (Village) on the date set forth below.

Recitals

WHEREAS, both the County and Village are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and the Village of South Amherst Village is desirous to collectively coordinate and collaborate with the County on compliance with the permit requirements; and

WHEREAS, Village also desires to become a co-permittee of the County as allowed by Ohio EPA under the NPDES permit; and

WHEREAS, the Village has undertaken the steps necessary to understand the District and its operation including billing mechanism and policies, and the Village shares compatible goals and objectives, and mutual interest in minimizing costs and increasing efficiencies; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through performance of the following matters including the six Phase II minimum control measures and further to comply with the Lorain County Storm Water Management Program:

District Participation

County Responsibility:

- Provide assistance with customer service including but not limited to development of property impervious area maps, fee calculations, and site visits.
- County will absorb maintenance costs for ditch projects for joint Village/County ditch improvement projects so long as funds are available consistent with the Policy set by the Board.
- County will assist the Village with pursuit of grant funding for stormwater quality and quantity.

Village Responsibility:

- Retain ownership and maintenance responsibility for all Village owned stormwater infrastructure.
- Submit an annual budget to the County consistent with the Business Plan and Financial Factsheet developed for the South Amherst Village Stormwater Utility Program.
- Submit a financial report on expenditures from the enterprise fund to the County at the end of each fiscal year.

General Conditions:

The County will provide a copy of its Storm Water Management Program to the Village as it is updated. The County and Village will review and address changes that may be needed as the Program is updated to incorporate changes in the District, current and future NPDES Permits, and evolving needs of the Village. Changes will be made to maintain compliance with the NPDES Permit and the Minimum Control Measures required.

The County will work with the Village to collect the necessary information to include and report to the Ohio EPA in the required Annual Report. The Annual Report will be submitted to Ohio EPA no later than March 31 of each year reporting on the activities undertaken the previous calendar year by the County and the Village including any actions that the Village may choose to do in addition to those activities contained in this agreement. A copy of the Annual Report will be provided to the Village for its records.

The County will actively work to provide compliance with the EPA NPDES Minimum Control Measures for which it is responsible as part of the MOU. However, the Village agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Village's responsibility to ensure compliance and maintain liability for said compliance within the permit.

Minimum Control Measures

The following breakdown of Minimum Control Measures (MCM) and responsibilities shall not prevent either party from going above and beyond the responsibilities outlined in the MOU. Any costs incurred for implementation beyond the outlined responsibilities shall be born solely by the entity that takes such an action. Should the Village take any actions beyond the scope of this agreement in furtherance of the NPDES Permit compliance, it is the Village responsibility to report and document the actions taken to the County. The County will then be able to include those activities within the Annual Report.

MCM #1 – Public Education and Outreach on Storm Water Impacts

County Responsibility:

County will develop and pay for Public Education materials for County and Village use. These will include Erosion Control Factsheet(s), Post Construction Factsheet(s) and a County Public Education Factsheet. The Public Education Factsheet will be developed in concert with the Lorain County Public Involvement and Public Education Committee (LCPIPE). The County will maintain a webpage with links to these brochures along with other information.

The County will provide to the Village annually a brochure in electronic format that is consistent with the PIPE Annual Theme over each permit term. The current MS4 permit runs through 2019.

The County will provide press releases to the Village for Public Education to be placed in newsletters and other outlets that the Village may choose to utilize.

The County will include the Village in its mailings – 50% of residential property rate payers will receive an educational brochure on the annual storm water theme in the mail once per year.

Village Responsibility:

Village will make the Factsheets developed by County available at Village Hall and other Village public meeting places.

Provide link to County Storm Water district Website on Village Website, if in existence.

Track number of brochures and number of each factsheet distributed and report numbers back to County at end of each year for inclusion in the Annual Report.

Include press releases from County relevant to Public Education on Storm Water on Village web site and social media, newsletters or other appropriate outlets available to the Village to inform the residents.

MCM #2 – Public Involvement / Participation

County Responsibility - The County is responsible for and will pay for the development of Public Involvement and Participation activities including:

Lorain County Public Involvement and Public Education (LCPIPE) Work Group, a representative from the County will attend work group sessions on behalf of the County and all co-permittees, relieving the Village from this responsibility.

Lorain County will distribute updates from the workgroup to the Village.

Solid and Hazardous Waste Disposal. County will collect data by zipcode to include with the annual report.

Lorain County Pride Day.

Lorain County Volunteer Stream Cleanup Program.

Lorain County Adopt a Highway Program.

Village Responsibility:

Village may send participants to the LCPIPE Work Group.

Village is responsible to make sure that the public Involvement/Participation activities are advertised to Village employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

County Responsibility:

The County will maintain an Illicit Discharge Detection & Elimination (IDDE) Program for the Village.

Forward model legislation consistent with existing County legislation to implement IDDE Program.

Screen outfalls within the Village and apply its protocols as established in its IDDE Program from testing through enforcement.

Inform Village of results of number of screenings, and data related to screenings.

Village Responsibility:

Pass legislation to update Illicit Discharge Detection & Elimination consistent with the County's IDDE Program.

Assist County in collection and inventory of current IDDE practices including providing information on:

a. MS4 Outfalls (location and previous screening results)
b. MS4 Mapping information for County to develop comprehensive storm sewer system map
c. Showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

Assist County in accessing property as may be necessary and in enforcement of the IDDE Program if Illicit Discharges are found.

MCM #4 – Construction Site Storm Water Runoff Control

County Responsibility:

The County has developed Construction Site Erosion Control regulations that have been implemented and which are required for all sites with more than one acre of disturbance, this information will be provided to the Village.

Assist Village with plan review, monthly inspections and enforcement as requested for compliance with the NPDES permit. Perform plan reviews and monthly inspections of active construction sites disturbing one or more acres.

Report known violations to Lorain County Storm Water Management District

Provide enforcement measures as needed. Examples may include issuing stop work order through Building Department or denying zoning permit until compliance with regulations is demonstrated.

Village Responsibility:

Adopt the Construction Erosion and Sediment Control regulations that the County has in place.

MCM #5 – Post Construction Storm Water Management

County Responsibility:

The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with more than one acre of disturbance, this information will be provided to the Village.

Provide plan review, inspections and enforcement as requested for compliance with the NPDES permit.

Comply with responsibilities outlined in the MOU between the Village and Lorain County Soil and Water Conservation District.

Perform plan review and inspections of post construction best management practices (BMPs) within the Village.

Obtain Long Term Inspection and Maintenance agreements with owners of all new post construction BMPs.

Report known violations to Lorain County Storm Water Management District Provide enforcement measures as needed.

Village Responsibility:

Adopt the Comprehensive Storm Water Management (Post Construction) Regulations that the County has in place.

MCM #6 – Pollution Prevention / Good Housekeeping

County Responsibility:

Lorain County has developed an Operation and Maintenance Manual that can be used by the Village

This manual will be updated by the County as needed during permit cycles with said updates provided to the Village.

Create Storm Water Pollution Prevention Plans (SWP3) for Village Facilities under the Ohio EPA MS4 permit coverage including:

d. Cemetery.
e. List of Village Facilities that require a SWP3.
f. Any future facilities constructed or acquired requiring a SWP3.

Provide technical assistance in customizing Operation and Maintenance Manual to meet specific Village requirements.

Forward training opportunities that appear to be relevant and/or useful for personnel that need continuing training.

Village Responsibility:

Expand upon and implement O & M manual for specific Village Facilities.

Implement and follow SWP3 for Village Facilities.

Forward training opportunities and information to Village employees.

Ensure Village Employees receive required training.

Log employee training hours.

Provide reporting to County on activities including but not limited to staff training hours, inspections of facilities quarterly, materials and amounts used to deice roads, incidental spills and releases, etc.

Administrative and Incidental Actions.

From time to time the County may receive correspondence from the Ohio EPA in regard to complaints from the General Public. The County will work with the Village to determine the nature of the complaint and what steps may need to be taken to ensure compliance is maintained.

Customer service functions that include phone calls to and from residents, MOU updates, meetings with OEPA for clarification and information will not be charged.

Coordination of drainage plans for capital improvements pursued in collaboration between the Village and County to control flooding will not be charged by County within this MOU.

Billing and Collection

County Responsibility:

- County agrees to implement a stormwater fee as established by the Village. County will then provide billing to the Village stormwater customers in the same manner as employed for the County Stormwater Utility Program.
- Prepare the billing database and impervious area update annually by end of July.
- Provide transfer to the Village's Stormwater Enterprise Fund twice per year within 30 days of payment receipt from the Lorain County Auditor for stormwater billing. Each transfer will be the full amount received from Village stormwater customers less 20% which is the amount of the annual MS4 services cost to implement the NPDES requirements.

Village Responsibility:

- Provide new development plans that change the impervious area.
- Certify annual billing database to the County Auditor by first Monday in September including rate adjustments due to change in fee per ERU and credits issued to customers

Cost:

Annual Costs

Costs incurred by the County in performing duties on behalf of the Village as a participant of the County Stormwater District shall be 20% of the amount collected in the stormwater utility program. The amount retained by the District will be reviewed annually by the District with the Mayor to determine if an adjustment is necessary in the following year.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party by June 1 and will go into effect on January 1 of the following year as billing and collection cannot be altered once set by the County Auditor. Annual costs will be prorated based on the time of termination within the year and the prorated amount must also be paid in full within (60) days of termination.

LORAIN COUNTY STORM WATER DISTRICT:	VILLAGE OF SOUTH AMHERST VILLAGE
S/James R. Cordes, District Director	S/Mayor David J. Leshinski
Date: 08/21/18	Date: 07/24/18
Approved As to Form:	
S/Gerald A. Innes	S/Michelle D. Nedwick
Lorain County Prosecutor's Office	Village of South Amherst Village Law Director
Date: 6-11-18	6-11-18

FURTHER BE IT RESOLVED, we hereby authorize James R. Cordes to executed MOU and this MOU can be found on file in the Stormwater District Office and Commissioners/Purchasing office

Motion by Matt Lundy, seconded by Lori Kokoski to adopt. Upon roll call the vote taken resulted: Ayes: Kalo, Kokoski & Lundy / Nays: none

Motion carried. _____(discussion was held on the above)

CERTIFICATE OF SECRETARY/TREASURER
I, hereby certify that the foregoing is a true and correct copy of Resolution No. SWD-18-5 adopted on the 21st day of August 2018

Matt Lundy - Secretary/Treasurer

MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (MOU) entered into by and between the Lorain County Storm Water Management District (County) and the Village of South Amherst (Village) on the date set forth below.

Recitals

WHEREAS, both the County and Village are required pursuant to the Clean Water Act to comply with certain NPDES (National Pollutant Discharge Elimination System) small MS4 (Municipal Separate Storm Water System) permit regulations of the Environmental Protection Agency (EPA) to develop and implement programs to detect and eliminate illicit discharges; and

WHEREAS, EPA allows MS4 permit holders to partner to jointly perform services required for compliance; and

WHEREAS, County has implemented a Storm Water Utility Fee and Business Plan which includes a set aside of funds to assist in achieving compliance with the Clean Water Act; and

WHEREAS, County has adopted the Lorain County Storm Water Management Plan as the basis of the County and the Village of South Amherst Village is desirous to collectively coordinate and collaborate with the County on compliance with the permit requirements; and

WHEREAS, Village also desires to become a co-permittee of the County as allowed by Ohio EPA under the NPDES permit; and

WHEREAS, the Village has undertaken the steps necessary to understand the District and its operation including billing mechanism and policies, and the Village shares compatible goals and objectives, and mutual interest in minimizing costs and increasing efficiencies; and

WHEREAS, the parties hereto have determined that it is in the best interests of their constituents to collaborate in the joint performance of certain EPA Phase II MS4 requirements as hereafter set forth in that:

It will be more economical.

It will save on duplication of efforts and use of resources.

Control of storm water crosses political boundaries, and it is therefore more effective if done through a coordinated effort of local governments.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained and other good and valuable consideration, the receipt of which is hereby acknowledged, the parties hereto agree to and promise to partner in complying with the Clean Water Act through performance of the following matters including the six Phase II minimum control measures and

further to comply with the Lorain County Storm Water Management Program:

District Participation

County Responsibility:

- Provide assistance with customer service including but not limited to development of property impervious area maps, fee calculations, and site visits.
- County will absorb maintenance costs for ditch projects for joint Village/County ditch improvement projects so long as funds are available consistent with the Policy set by the Board.
- County will assist the Village with pursuit of grant funding for stormwater quality and quantity.

Village Responsibility:

- Retain ownership and maintenance responsibility for all Village owned stormwater infrastructure.
- Submit an annual budget to the County consistent with the Business Plan and Financial Factsheet developed for the South Amherst Village Stormwater Utility Program.
- Submit a financial report on expenditures from the enterprise fund to the County at the end of each fiscal year.

General Conditions:

The County will provide a copy of its Storm Water Management Program to the Village as it is updated. The County and Village will review and address changes that may be needed as the Program is updated to incorporate changes in the District, current and future NPDES Permits, and evolving needs of the Village. Changes will be made to maintain compliance with the NPDES Permit and the Minimum Control Measures required.

The County will work with the Village to collect the necessary information to include and report to the Ohio EPA in the required Annual Report. The Annual Report will be submitted to Ohio EPA no later than March 31 of each year reporting on the activities undertaken the previous calendar year by the County and the Village including any actions that the Village may choose to do in addition to those activities contained in this agreement. A copy of the Annual Report will be provided to the Village for its records.

The County will actively work to provide compliance with the EPA NPDES Minimum Control Measures for which it is responsible as part of the MOU. However, the Village agrees that the County will not be liable for any EPA noncompliance findings or fines. It is the Village's responsibility to ensure compliance and maintain liability for said compliance within the permit.

Minimum Control Measures

The following breakdown of Minimum Control Measures (MCM) and responsibilities shall not prevent either party from going above and beyond the responsibilities outlined in the MOU. Any costs incurred for implementation beyond the outlined responsibilities shall be born solely by the entity that takes such an action. Should the Village take any actions beyond the scope of this agreement in furtherance of the NPDES Permit compliance, it is the Village responsibility to report and document the actions taken to the County. The County will then be able to include those activities within the Annual Report.

MCM #1 – Public Education and Outreach on Storm Water Impacts

County Responsibility:

- County will develop and pay for Public Education materials for County and Village use. These will include Erosion Control Factsheet(s), Post Construction Factsheet(s) and a County Public Education Factsheet. The Public Education Factsheet will be developed in concert with the Lorain County Public Involvement and Public Education Committee (LCPIPE). The County will maintain a webpage with links to these brochures along with other information.

- The County will provide to the Village annually a brochure in electronic format that is consistent with the PIPE Annual Theme over each permit term. The current MS4 permit runs through 2019.

- The County will provide press releases to the Village for Public Education to be placed in newsletters and other outlets that the Village may choose to utilize.

- The County will include the Village in its mailings – 50% of residential property rate payers will receive an educational brochure on the annual storm water theme in the mail once per year.

Village Responsibility:

- Village will make the Factsheets developed by County available at Village Hall and other Village public meeting places.

- Provide link to County Storm Water district Website on Village Website, if in existence.

- Track number of brochures and number of each factsheet distributed and report numbers back to County at end of each year for inclusion in the Annual Report.

- Include press releases from County relevant to Public Education on Storm Water on Village web site and social media, newsletters or other appropriate outlets available to the Village to inform the residents.

MCM #2 – Public Involvement / Participation

County Responsibility - The County is responsible for and will pay for the development of

Public Involvement and Participation activities including:

- Lorain County Public Involvement and Public Education (LCPIPE) Work Group, a representative from the County will attend work group sessions on behalf of the County and all co-permittees, relieving the Village from this responsibility.
- Lorain County will distribute updates from the workgroup to the Village.
- Solid and Hazardous Waste Disposal. County will collect data by zipcode to include with the annual report.
- Lorain County Pride Day.
- Lorain County Volunteer Stream Cleanup Program.
- Lorain County Adopt a Highway Program.

Village Responsibility:

- Village may send participants to the LCPIPE Work Group.
- Village is responsible to make sure that the public Involvement/Participation activities are advertised to Village employees and residents.

MCM #3 – Illicit Discharge Detection & Elimination

County Responsibility:

- The County will maintain an Illicit Discharge Detection & Elimination (IDDE) Program for the Village.
- Forward model legislation consistent with existing County legislation to implement IDDE Program.
- Screen outfalls within the Village and apply its protocols as established in its IDDE Program from testing through enforcement.
- Inform Village of results of number of screenings, and data related to screenings.

Village Responsibility:

- Pass legislation to update Illicit Discharge Detection & Elimination consistent with the County's IDDE Program.

- Assist County in collection and inventory of current IDDE practices including providing information on:

    - MS4 Outfalls (location and previous screening results)

    - MS4 Mapping information for County to develop comprehensive storm sewer system map

    - Showing the location of all outfalls and the names and location of all surface waters of the State that receive discharges from those outfalls. Within five years of when your coverage under this general permit was granted, your comprehensive storm sewer system map shall also include your MS4 system (owned and/or operated by you), including catch basins, pipes, ditches, flood control facilities (retention/detention ponds), post-construction water quality BMPs and private post construction water quality BMPs which have been installed to satisfy Ohio EPA's NPDES Construction Storm Water general permit and/or your local post-construction water quality BMP requirements.

- Assist County in accessing property as may be necessary and in enforcement of the IDDE Program if Illicit Discharges are found.

MCM #4 – Construction Site Storm Water Runoff Control

County Responsibility:

- The County has developed Construction Site Erosion Control regulations that have been implemented and which are required for all sites with more than one acre of disturbance, this information will be provided to the Village.

- Assist Village with plan review, monthly inspections and enforcement as requested for compliance with the NPDES permit. Perform plan reviews and monthly inspections of active construction sites disturbing one or more acres.

- Report known violations to Lorain County Storm Water Management District

- Provide enforcement measures as needed. Examples may include issuing stop work order through Building Department or denying zoning permit until compliance with regulations is demonstrated.

Village Responsibility:

- Adopt the Construction Erosion and Sediment Control regulations that the County has in place.

MCM #5 – Post Construction Storm Water Management

County Responsibility:

- The county has developed Post Construction Storm Water regulations that have been implemented and which are required for all sites with more than one acre of disturbance, this information will be provided to the Village.
- Provide plan review, inspections and enforcement as requested for compliance with the NPDES permit.
- Comply with responsibilities outlined in the MOU between the Village and Lorain County Soil and Water Conservation District.
- Perform plan review and inspections of post construction best management practices (BMPs) within the Village.
- Obtain Long Term Inspection and Maintenance agreements with owners of all new post construction BMPs.
- Report known violations to Lorain County Storm Water Management District
- Provide enforcement measures as needed.

Village Responsibility:

- Adopt the Comprehensive Storm Water Management (Post Construction) Regulations that the County has in place.

MCM #6 – Pollution Prevention / Good Housekeeping

County Responsibility:

- Lorain County has developed an Operation and Maintenance Manual that can be used by the Village. This manual will be updated by the County as needed during permit cycles with said updates provided to the Village.
- Create Storm Water Pollution Prevention Plans (SWP3) for Village Facilities under the Ohio EPA MS4 permit coverage including:
    - Cemetery.
    - List of Village Facilities that require a SWP3.
    - Any future facilities constructed or acquired requiring a SWP3.

- Provide technical assistance in customizing Operation and Maintenance Manual to meet specific Village requirements.

- Forward training opportunities that appear to be relevant and/or useful for personnel that need continuing training.

Village Responsibility:

- Expand upon and implement O & M manual for specific Village Facilities.

- Implement and follow SWP3 for Village Facilities.

- Forward training opportunities and information to Village employees.

- Ensure Village Employees receive required training.

- Log employee training hours.

- Provide reporting to County on activities including but not limited to staff training hours, inspections of facilities quarterly, materials and amounts used to deice roads, incidental spills and releases, etc.

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Customer service functions that include phone calls to and from residents, MOU updates, meetings with OEPA for clarification and information will not be charged.

Coordination of drainage plans for capital improvements pursued in collaboration between the Village and County to control flooding will not be charged by County within this MOU.

Billing and Collection

County Responsibility:

- County agrees to implement a stormwater fee as established by the Village. County will then provide billing to the Village stormwater customers in the same manner as employed for the County Stormwater Utility Program.

- Prepare the billing database and impervious area update annually by end of July.

- Provide transfer to the Village's Stormwater Enterprise Fund twice per year within 30 days of payment receipt from the Lorain County Auditor for stormwater billing. Each transfer will be the full amount received from Village stormwater customers less 20%

which is the amount of the annual MS4 services cost to implement the NPDES requirements.

Village Responsibility:

- Provide new development plans that change the impervious area.
- Certify annual billing database to the County Auditor by first Monday in September including rate adjustments due to change in fee per ERU and credits issued to customers

Cost:

Annual Costs

Costs incurred by the County in performing duties on behalf of the Village as a participant of the County Stormwater District shall be 20% of the amount collected in the stormwater utility program. The amount retained by the District will be reviewed annually by the District with the Mayor to determine if an adjustment is necessary in the following year.

Termination

This MOU may be terminated by either party upon sixty (60) days written notice to the other party by June 1 and will go into effect on January 1 of the following year as billing and collection cannot be altered once set by the County Auditor. Annual costs will be prorated based on the time of termination within the year and the prorated amount must also be paid in full within (60) days of termination.

LORAIN COUNTY STORM WATER DISTRICT:

By: _____

Date: 08/21/2018

VILLAGE OF SOUTH AMHERST VILLAGE

By: David J. Lyskowski

Date: 7-24-2018

Approved As to Form:

By: _____
Lorain County Prosecutor's Office

Date: 6-11-18

By: Michelle D. Dedvick
Village of South Amherst Village Law Director

Date: 6-11-18

RECORD OF ORDINANCE
VILLAGE OF SOUTH AMHERST

Ordinance No. 1582-18 Passed 7/23, 2018

AN ORDINANCE AUTHORIZING THE MAYOR TO ENTER INTO A MEMORANDUM OF UNDERSTANDING WITH THE LORAIN COUNTY STORM WATER DISTRICT TO BECOME STORM WATER CO-PERMITTEES UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) SMALL MUNICIPAL SEPARATE STORM SEWER SYSTEM PERMIT REGULATIONS OF THE OHIO ENVIRONMENTAL PROTECTION AGENCY, AND DECLARING AN EMERGENCY.

WHEREAS, Both Lorain County and the Village of South Amherst are required pursuant to the Clean Water Act, to comply with National Pollutant Discharge Elimination System (NPDES) small Municipal Separate Storm Sewer permit regulations to develop and implement programs to detect and eliminate illicit discharges to storm water systems; and

WHEREAS, the Ohio Environmental Protection Agency allows permit holders to partner to jointly perform services required for compliance; and

WHEREAS, Lorain County and the Village of South Amherst have determined that it is in the best interests of their constituents to collaborate in the joint performance of services required for permit compliance as storm water management is an inter-jurisdictional issue and such collaboration will be more economical as it will provide for the shared use of resources and save on supplication of effort.

NOW, THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE VILLAGE OF SOUTH AMHERST, LORAIN COUNTY, STATE OF OHIO THAT:

SECTION 1: The Mayor is hereby authorized and directed to enter into the proposed Memorandum of Understanding between the Village of South Amherst and the Lorain County Storm Water District to become storm water co-permittees under the National Pollutant Discharge Elimination System (NPDES) small Municipal Separate Storm Sewer System permit regulations of the Ohio Environmental Protection Agency, a copy of said Memorandum of Understanding being attached hereto as Exhibit A and incorporated herein by reference.

SECTION 2: That it is found and determined that all formal actions of this Council concerning and relating to the adoption of this Ordinance were adopted in an open meeting of this Council, and that all deliberations of this Council and any of its committees that resulted in

such formal action, were in meetings open to the public, in compliance with all legal requirements, including Section 121.22 of the Ohio Revised Code.

SECTION 3: That this Ordinance is declared to be an emergency measure necessary to facilitate storm water management, and the immediate preservation of the public health, safety and welfare of the Village, wherefore, this Ordinance shall be in full force and effect from and immediately after its passage and approval.

First Reading: 4/25/18

Second Reading: 7/9/18

PASSED: 7/23/18

David J. Leshinski

David Leshinski, Mayor

ATTEST: Michelle Henke

Fiscal Officer

I, Michelle Henke, Fiscal Officer of the Village of South Amherst, certify there is no newspaper of general circulation published in the municipality and the publishing of this Ordinance No. 15.62.18 was made by posting true copies thereof in at least five of the most public places in the said Village, determined by Council, for a period of not less than fifteen (15) days, following the passage.

Michelle Henke

Fiscal Officer

APPROVED AS TO FORM:

Michelle D. Nedwick

Michelle D. Nedwick, Law Director

SA\2018ordinance.Memorandum of Understanding

Exhibit 2 – Illicit Discharge Resolutions

- ILLICIT DISCHARGE RESOLUTION

B.12

RESOLUTION NO. 10-417

In the matter of establishing methods for)
controlling the introduction of pollutants)
into the MS4 in order to comply with)
requirements of the National Pollutant)
Discharge Elimination System permit)
process as required by OHEPA)

June 23, 2001

WHEREAS, the Lorain County Board of Commissioners establishes methods for controlling the introduction of pollutants into the MS4 in order to comply with requirements of the National Pollutant Discharge Elimination System permit process as required by OHEPA; and

WHEREAS, this resolution is for illicit discharge and illegal connection control

I. PURPOSE AND SCOPE

The purpose of this regulation is to provide for the health, safety, and general welfare of the citizens of Lorain County, Ohio (County) through the regulation of illicit discharges to the municipal separate storm sewer system (MS4). This regulation establishes methods for controlling the introduction of pollutants into the MS4 in order to comply with requirements of the National Pollutant Discharge Elimination System (NPDES) permit process as required by the Ohio Environmental Protection Agency (Ohio EPA). The objectives of this regulation are:

A. To prohibit illicit discharges and illegal connections to the MS4.

B. To establish legal authority to carry out inspections, monitoring procedures, and enforcement actions necessary to ensure compliance with this regulation.

II. APPLICABILITY

This regulation shall apply to all residential, commercial, industrial, or institutional facilities responsible for discharges to the MS4 and on any lands in the County, except for those discharges generated by the activities excepted by state or federal law.

III. DEFINITIONS

The words and terms used in this regulation, unless otherwise expressly stated, shall have the following meaning:

A. Best Management Practices (BMPs): means schedules of activities, prohibitions of practices, general good house keeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants to storm water. BMPs also include treatment practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials' storage.

B. Environmental Protection Agency or United States Environmental Protection Agency (USEPA): means the United States Environmental Protection Agency, including but not limited to the Ohio Environmental Protection Agency (Ohio EOA), or any duly authorized official of said agency.

C. Floatable Material: in general this term means any foreign matter that may float or remain suspended in the water column, and includes but is not limited to, plastic, aluminum cans, wood products, bottles, and paper products.

D. Hazardous Material: means any material including any substance, waste, or combination thereof, which because of its quantity, concentration, or physical, chemical or infectious characteristics may cause, or significantly contribute to, a substantial present or potential hazard to human health, safety, property, or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

E. Illicit Discharge: as defined at 40 C.F.R. 122.26 (b)(2) means any discharge to an MS4 that is not composed entirely of storm water, except for those discharges to an MS4 pursuant to a NPDES permit or excepted by state or federal law.

F. Illegal Connection: means any drain or conveyance, whether on the surface or subsurface that allows an illicit discharge to enter the MS4.

G. Municipal Separate Storm Sewer System (MS4): as defined at 40 C.F.R. 122.26 (b)(8), municipal separate storm sewer means a conveyance or system of conveyances, (including roads with drainage systems, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

1. Owned or operated by a State, city, town, borough, county, parish, district, municipality, township, county, district, association, or other public body (created by or pursuant to State law) having jurisdiction over sewage, industrial wastes, including special districts under State law such as a sewer district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the Clean Water Act that discharges to waters of the United States;
2. Designed or used for collecting or conveying storm water;
3. Which is not a combined sewer; and
4. Which is not part of a Public Owned Treatment Works (POTW) as defined at 40 C.F.R. 122.2.

H. National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit: means a permit issued by EPA (or by a State under authority delegated pursuant to 33 USC § 1342(b))that authorized the discharge of pollutants to waters of the United States, whether the permit is applicable on an individual, group, or general area-wide basis.

I. Off-Lot Discharging Home Sewage Treatment System: means a system designed to treat home sewage on-site and discharges treated wastewater effluent off the property into a storm water or surface water conveyance system.

J. Owner/Operator: means any individual, association, organization, partnership, firm, corporation or other entity recognized by law and acting as either the owner or on the owner's behalf.

K. Pollutant: means anything that causes or contributed to pollution. Pollutants may include but are not limited to, paints, varnishes, solvents, oil and other automotive fluids, non-hazardous liquid and solid wastes, yard wastes, refuse, rubbish, garbage, litter or other discarded or abandoned objects, floatable materials, pesticides, herbicides, fertilizers, hazardous materials, wastes, sewage, dissolved and particulate metals, animal wastes, residues that result from constructing a structure, and noxious or offensive matter of any kind.

L. Storm Water: any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation, and resulting from such precipitation.

M. Wastewater: The spent water of a community. From the standpoint of a source, it may be a combination of the liquid and water carried wastes from residences, commercial buildings, industrial plants and institutions.

IV. DISCLAIMER OF LIABILITY

Compliance with the provisions of this regulation shall not relieve any person from responsibility for damage to any person otherwise imposed by law. The provisions of this regulation are promulgated to promote the health, safety, and welfare of the public and are not designed for the benefit of any individual or for the benefit of any particular parcel of property.

V. CONFLICTS, SEVERABILITY, NUISANCES & RESPONSIBILITY

A. Where this regulation is in conflict with other provisions of law, the most restrictive provisions, as determined by the County shall prevail.

B. If any clause, section, or provision of this regulation is declared invalid or unconstitutional by a court of competent jurisdiction, the validity of the remainder shall not be affected thereby.

C. This regulation shall not be construed as authorizing any person to maintain a nuisance on their property, and compliance with the provisions of this regulation shall not be a defense in any action to abate such a nuisance.

D. Failure of the County to observe or recognize hazardous or unsightly conditions or to recommend corrective measures shall not relieve the site owner from the responsibility for the condition or damage resulting therefrom, and shall not result in the County, its officers, employees, or agents being responsible for any condition or damage resulting therefrom.

VI. RESPONSIBILITY FOR ADMINISTRATION

The County shall administer, implement, and enforce the provisions of this regulation. The County may contract with the Board of Health to conduct inspections and monitoring and to assist with enforcement actions.

VII. DISCHARGE AND CONNECTION PROHIBITIONS

A. Prohibition of Illicit Discharges. No person shall discharge, or cause to be discharged, an illicit discharge into the MS4. The commencement, conduct, or continuance of any illicit discharge tot he MS4 is prohibited except as described below:

1. Water line flushing; landscape irrigation; diverted stream flows; rising ground waters; uncontaminated ground water infiltration; uncontaminated pumped ground water; discharges from potable water sources; foundation drains; air conditioning condensation; irrigation water; springs; water from crawl space pumps; footing drains; lawn watering; individual residential car washing; flows from riparian habitats and wetlands; dechlorinated swimming pool discharges; street wash water; and discharges or flows from fire fighting activities. These discharges are exempt until such time as they are determinated by the County to be significant contributors of pollutants to the MS4.
2. Discharges specified in writing by the County as being necessary to protect public health and safety.
3. Discharges from off-lot household sewage treatment systems permitted by the Board of Health for the purpose of discharging treated sewage effluent in accordance with Ohio Administrative Code 3701-29-02 (6) until such time as the Ohio Environmental Protection Agency issues a NPDES permitting mechanism for residential 1, 2 or 3 family dwellings. These discharges are exempt unless such discharges are deemed to be creating a public health nuisance by the Board of Health.

B. Prohibition of Illegal Connections. The construction, use, maintenance, or continued existence of illegal connections to the MS4 is prohibited.

1. This prohibition expressly includes, without limitation, illegal connections made in the past, regardless or whether the connection was permissible under law or practices applicable or prevailing at the time of connection.
2. A person is considered to be in violation of this regulation if the person connects a line conveying illicit discharges to the MS4, or allows such a connection to continue.

VIII. MONITORING OF ILLICIT DISCHARGES AND ILLEGAL CONNECTIONS

A. Establishment of an Illicit Discharge and Illegal Connection Monitoring Program: The County shall establish a program to detect and eliminate illicit discharges and illegal connections to the MS4. This program shall include the mapping of the MS4, the routine inspection of storm water outfalls to the MS4, and the systematic investigation of potential residential, commercial, industrial, and institutional facilities for the sources of any dry weather flows found as the result of these inspections.

B. Inspection of Residential, Commercial, Industrial or Institutional Facilities

1. The County shall make regular general inspections of the County to determine the existence of facilities noncompliant with this regulation.
2. On the basis of the general inspection the County shall pursue a cooperative effort to remedy any noncompliant conditions through one or more of the following steps.
   a. Enter and inspect the premises for further inspection as deemed necessary to determine compliance.
   b. Set up devices to conduct monitoring and/or sampling of the facility's storm water discharge.
   c. Require the facility owner/operator to install monitoring equipment as necessary, including sampling and monitoring equipment to be kept in operating condition by the owner and calibrated devices for measuring storm water flow.
   d. Provide for reasonable follow-up inspection by the County to determine adherence to the monitoring plan. A schedule will be developed whereby owner/operator will allow County safe and reasonable access to the premises for inspection. Owner/operator shall remove obstructions to such access.
3. If the County is refused access to any part of the facility/premises from which storm water is discharged, and the County demonstrates probable cause to believe these may be a violation of this regulation, or there is a need to inspect and/or sample to verify compliance with this, or to protect the public health, safety and welfare, the County may seek issuance of a search warrant, civil remedies including but not limited to injunctive relief, and/or criminal remedies from any court of appropriate jurisdiction.

IX. ENFORCEMENT

A. Notice of violation. When the County finds that a person has violated a prohibition or failed to meet a requirement of this regulation, the County may order compliance by written Notice of Violation. Such notice must specify the violation and shall be hand delivered, and/or sent by registered mail; to the owner/operator of the facility. Such notice may require the following actions:

1. The performance of monitoring, analyses, and reporting;
2. The elimination of illicit discharges or illegal connections;
3. That violating discharges, practices, or operations cease and desist;
4. The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property; or
5. The implementation of source control or treatment BMPs.

B. If abatement of a violation and/or restoration of affected property is required, the Notice of Violation shall set forth a deadline within which such remediation or restoration must be completed. Said Notice shall further advise that, should the facility owner/operator fail to remediate or restore within the established deadline, a legal action for enforcement may be initiated.

C. Any person receiving a Notice of Violation must meet compliance standards within the time established in the Notice of Violation.

D. Administrative Hearing: If the violation has not been corrected pursuant to the requirements set forth in the Notice of Violation, the County shall schedule an administrative hearing to determine reasons for non-compliance and to determine the next enforcement activity. Notice of the administrative hearing shall be hand delivered and/or sent registered mail.

E. Administrative hearings shall be conducted by the Board of Commissioners, or by any officer or body designated by the Board of Commissioners by further resolution.

F. Injunctive Relief: It shall be unlawful for any owner/operator to violate any provision or fail to comply with any of the requirements of this regulation pursuant to O.R.C. 3709.211. If an owner/operator has violated or continues to violate the provisions of this regulation, the County may petition for a preliminary or permanent injunction restraining the owner/operator from activities that would create further violations or compelling the owner/operator to perform abatement or remediation of the violation.

X. **REMEDIES NOT EXCLUSIVE**

The remedies listed in this regulation are not exclusive of any other remedies available under any applicable federal, state or local law and it is in the discretion of the County to seek cumulative remedies.

Motion by Kalo, seconded by Kokoski to adopt Resolution. Ayes: Kalo & Kokoski / Absent: Blair had an appointment.

Motion carried. _____(discussion was held on the above)

I, Theresa L. Upton, Clerk to the Lorain County Board of Commissioners do hereby certify that the above Resolution No. 10-417 is a true copy as it appears in Journal No. 10 on date of June 23, 2010.

Theresa L. Upton, Clerk

City of Oberlin

IDDE Ordinance

915.07 WASTEWATER TREATMENT REQUIRED.

No person shall discharge to any natural surface or subsurface drainage course, culvert, storm sewer, street gutter or drainage channel within the City, or lands owned by the City, any sewage or other polluted waters, except where effective and reliable treatment has been provided in accordance with the subsequent provisions of this section. Effective and reliable treatment shall be accomplished by connection to the Municipal sanitary sewer system or, in the absence of an abutting sewer main, by connection to a private treatment system approved by the County Health District and in conformance with the standards and specifications provided hereinafter. Any building that has sanitary facilities, or is used by human occupants for living or sleeping, must be connected to the sanitary sewer if such sewer abuts the building lot. (Ord. 95-20AC. Passed 4-3-95.)

Exhibit 3 – Erosion Control Resolutions and Rules

RESOLUTION NO. 19-713

In the matter of approving updated Lorain County) Erosion and Sediment Control Regulations to) maintain compliance with Ohio Environmental) Protection Agency's current National Pollutant) Discharge Elimination Permit and updating fees)

October 30, 2019

WHEREAS, The Lorain County Storm Water Management District and its co-permittees hold a National Pollutant Discharge Elimination Permit through the Ohio Environmental Protection Agency (OEPA) over time; and

WHEREAS, the Ohio Environmental Protection Agency amends and updates requirements of the National Pollutant Discharge Elimination Permit (NPDES); and

WHEREAS, permit holding communities are required to comply with these changes; and

WHEREAS, The Lorain County Storm Water Management District is requesting to update the Erosion and Sediment Control Regulations and permit fees to maintain compliance with the Ohio EPA's NPDES program; and

WHEREAS, the Lorain County Commissioners held 2 public hearing on October 15, 2019 and October 30, 2019; and

WHEREAS, Under Ohio Revised Code 307.79, the board of county Commissioners may adopt, amend, and rescind rules establishing technically feasible and economically reasonable standards to achieve a level of management and conservation practices that will abate wind or water erosion of the soil or abate the degradation of waters of the state.

NOW THEREFORE BE IT Resolved, based upon the above information, the Lorain County Board of Commissioners hereby approve updates to the Lorain County Erosion and Sediment Control Regulations and permit fees to maintain compliance with OEPA's NPDES program.

Motion by Lundy seconded by Kokoski to adopt Resolution. Upon roll call the vote taken thereon, resulted as: Ayes: Lundy, Kokoski, & Sweda / Nays: None
Motion carried.

I, Theresa L. Upton, Clerk to the Lorain County Board of Commissioners do hereby certify that the above Resolution No. 19-713 is a true copy as it appears in Journal No. 19 on date of October 30, 2019

Theresa L. Upton, Clerk

NPDES – PHASE II

LORAIN COUNTY
EROSION & SEDIMENT CONTROLREGULATIONS

Effective – June 29, 2008
Addendum – November 19, 2009
Updated – November, 2016
Updated – November, 2018
Updated – November, 2019

Administrator:

Lorain Soil & Water Conservation District

Agricultural Center
42110 Russia Road
Elyria, Ohio 44035

Phone – 440-326-5800
Fax – 440-326-5807

www.lorainswcd.com

REFERENCES

The standards and specifications for Best Management Practices are contained within the

Rainwater and Land Development Manual, Ohio's Standards For Storm Water Management, Land Development and Urban Stream Protection, current edition

published in cooperation with:

Ohio Department of Natural Resources Division of Soil and Water Conservation
U.S.D.A. Natural Resource Conservation Service Ohio Environmental Protection Agency

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Appendix A - Application

LORAIN COUNTY EROSION & SEDIMENT CONTROL RULES

1. Purpose and Scope

1.1 The Lorain County Board of Commissioners adopts these Erosion and Sediment Control Rules, pursuant to Ohio Revised Code, Section 307.79, to establish technically feasible and economically reasonable standards to achieve a level of management and conservation practices in order to abate soil erosion and degradation of the waters of the State by soil sediment on land used or being developed for non-farm commercial, industrial, residential or other non-farm purposes, to establish criteria for determination of the acceptability of such management and conservationpractices, and to implement Phase II of the storm water program of the National Pollutant Discharge Elimination System (NPDES) established in 40 CFR Part 122, and to promote thehealth, safety and well-being of the residents of Lorain County. Specifically, the Rules are intended to protect:

a) Adjacent landowners from property loss due to sedimentation, erosion and flooding.

b) County and township ditches, culverts and storm sewers from loss of capacity due to siltation.

c) Water and habitat quality in streams and wetlands.

1.2 These Rules apply to soil-disturbing activities on land within the unincorporated area of Lorain County used or being developed for non-farm commercial, industrial, residential, or other non-farm purposes, including, but not limited to, individual or multiple lots, subdivisions, multi-family developments, commercial and industrial developments, recreational projects, general clearing and grading projects, underground utilities, highways, building activities on farms,redevelopment of urban areas and all other uses unless expressly excluded as follows:

a) Activities related to producing agricultural crops or silviculture operations or areasregulated by the Ohio Agricultural Sediment Pollution Abatement Rules.

b) Strip mine and surface mine operations.

1.3 An Erosion and Sediment Control Plan is not required before clearing, grading, excavating, filling or otherwise wholly or partially disturbing less than one contiguous acre of land owned by one person or operated as one development unit for the construction of non-farm buildings, structures, utilities, recreational areas or other similar non-farm uses; however, areas of

less than one contiguous acre are not exempt from compliance with all other provisions of these Rules.

1.4 An Erosion and Sediment Control Plan is not required for a public highway, transportation, or drainage improvement or maintenance thereof undertaken by a governmentagency or political subdivision in accordance with a statement of its Standard Sediment Control Policies that is approved by the Lorain County Board of Commissioners or the Chief of theODNR Division of Soil and Water Conservation.

1.5 No soil disturbing activities shall commence without compliance with these rules.

1.6 **Disclaimer of Liability**

Compliance with the provisions of this regulation shall not relieve any person from responsibility for damage to any person otherwise imposed by law. The provisions of this regulation are promulgated to promote the health, safety, and welfare of the public and are not designed for the benefit of any individual or for the benefit of any particular parcel of property.

1.7 **Conflicts, Severability, Nuisances and Responsibility**

(a) Where this regulation is in conflict with other provisions of law, resolutions,or ordinances, the most restrictive provisions shall prevail.

(b) If any clause, section, or provision of this regulation is declared invalid or unconstitutional by a court of competent jurisdiction, the validity of the remainder shall not be affected thereby.

(c) This regulation shall not be construed as authorizing any person to maintain a private or public nuisance on their property, and compliance with the provisions of this regulation shall not be a defense in any action to abate such a nuisance.

(d) Failure of the County to observe or recognize hazardous or unsightly conditions or to recommend corrective measures shall not relieve the site owner from the responsibility for the condition or damage resulting therefrom, and shall notresult in the County, its officers, employees, or agents being responsible for any condition or damage resulting therefrom.

2 Terms Defined

2.1 Interpretation of Terms and Words

(a) Words used in the present tense include the future tense and the singular include the plural, unless the context clearly indicates the contrary.

(b) The term "shall" and "must" are always mandatory and not discretionary. The word "may" is permissive. The term "should" is permissive but indicates strong suggestion.

(c) The word or term not interpreted or defined by this section shall be construed according to the rules of grammar and common usage so as to give these Rules their most reasonable application.

2.2 Definitions

Abbreviated Erosion and Sediment Control Plan (Abbreviated ESC Plan): The written document that sets forth the plans and practices to be used to meet the requirements of this regulation.

Accelerated Soil Erosion: The increased loss of the land surface that occurs as a result of human activities.

Acre: A unit of measure equaling 43,560 square feet.

Administrator: The person or entity having the responsibility and duty of administering and ensuring compliance with these Rules. The Administrator shall be appointed by the Board of Lorain County Commissioners.

Best Management Practices: Structural or nonstructural facilities or activities that control soil erosion and/or storm water runoff at a development site. Includes treatment requirements, operating and maintenance procedures, or other practices to control site runoff, leaks, or waste disposal.

Buffer Area: A designated transitional area around a stream or wetland left in a natural, usually vegetated, state so as to protect a stream or wetland from runoff pollution. Construction activities in this area shall be restricted or prohibited based on the sensitivity of the stream or wetland and the recommendation of the Administrator.

Channel: A natural or manmade bed or ditch, existing or excavated for the conveyance of water.

Commencement of Construction: The initial disturbance of soils associated with clearing, grubbing, grading, placement of fill, or excavating activities or other construction activities.

Common Plan of Development: A term used to define the entire scope of a development project, both on-site and off-site, regardless of ownership, including phases (future and existing), sublots, and parcels of development, associated easements, road and utility right of ways, and other land development or soil disturbances in support of the development project.

Clean Water Act: The Federal Water Pollution Control Act enacted in 1972 by Public Law 92-500and amended by the Water Quality Act prohibits the discharge of pollutants to Waters of the United States unless said discharge is in accordance with an NPDES permit. The 1987 amendments include guidelines for regulating municipals, industrial, and construction storm water discharges under the NPDES permit.

Conservation: The development of land using alternative layout and building arrangements in order to better conserve open space and retain natural resources.

Construction Entrance: The permitted points of ingress and egress to development areas regulated under this regulation.

Critical Area: Any portion of an area subject to this Rule the disturbance of which would cause soil erosion and sediment run-off and damage to private properties, water courses, storm sewers or public lands due to topography, soil type, hydrology or proximity to a water course. These areas include, but are not limited to, riparian areas, wetlands and highly erodible soils.

Cut: An excavation that reduces an existing elevation, as in road or foundation construction.

Development Area: A contiguous area owned by one person or persons, or operated as one development

unit, and used or being developed for non-farm commercial, industrial, residential or other institutional construction or alteration which changes the runoff characteristics of a parcel of land.

Development Project: An area of land, parcel or parcels, portions of parcels, and associated land disturbance that is being developed, redeveloped, or disturbed in support of development, for non-farm commercial, industrial, residential or other institutional construction or alteration which changes, either permanently or temporarily, the runoff characteristics or grade of the lands therein.

Dewatering Volume: See current Ohio Rainwater and Land Development Manual.

Discharge: The addition of any pollutant to surface waters of the state from a point source.

Disturbance: Any clearing, grading, excavating, filling, or other alteration of land surface where natural or man-made cover is destroyed in a manner that exposes the underlying soils.

Disturbed Area: An area of land subject to erosion due to the removal of vegetative cover and/or soil moving activities, including filling.

Ditch: An open channel, either dug or natural, for the purpose of drainage or irrigation with intermittent flow.

Drainage: The removal of excess surface water or groundwater from land by surface or subsurface drains.

Drainage Surface Area: An area, measured in a horizontal plane, enclosed by a topographic divide from which surface runoff from precipitation normally drains by gravity into a stream above the specified point of measurement.

Drainage Improvement: An improvement as defined in O.R.C. 6131.01(C), and/or conservation works of improvement as defined in O.R.C. 1511 and 1515.

Drainage Way: A natural or manmade channel, ditch, or waterway that conveys surface water in a concentrated manner by gravity. See also watercourse, channel, stream.

Dumping: A grading, pushing, piling, throwing, unloading or placing.

Earth Material: The soil, sediment, rock, sand, gravel and organic material or residue associated with or attached to the soil.

Engineer: A Professional Engineer registered in the State of Ohio.

Erosion: The process by which the land surface is worn away by the action of wind, water, ice, gravity or any combination of those forces.

Erosion and Sediment Control: The control of soil material, both mineral and organic, during soil-disturbing activity to prevent its transport out of the disturbed area by means of wind, water, ice or gravity.

Erosion Sediment Control Plan: The written document meeting the requirements of Sections 3, 4 and 5 of these Rules which sets forth the plans and practices to be used to minimize soil erosion and prevent off-site disposal of soil sediment by containing sediment on-site or by passing sediment-laden runoff

through a sediment control measure during and after land development.

Farm: Land or water devoted to agricultural uses as defined in O.R.C. 519.01 including farming; ranching; aquaculture; horticulture; viticulture; animals; poultry husbandry and the production poultry products; dairy production; the productions of field crops, tobacco, fruits, vegetables, nursery stock, ornamental shrubs, ornamental trees, flowers, sod, or mushrooms; timber; pasturage, any combination of the foregoing; the processing, drying, storage, and marketing of agricultural products when those activities are conducted in conjunction with, but are secondary to, such husbandry or production.

Final Stabilization: All soil-disturbing activities at the site have been completed and a uniform perennial vegetative cover with a density of at least 70% cover for all disturbed areas has been established or equivalent stabilization measures, such as the use of mulches or geo-textiles, have been employed. In addition, all temporary erosion and sediment control practices are removed and disposed of and all trapped sediment is permanently stabilized to prevent further erosion. Final stabilization also requires the installation of permanent (post-construction) BMPs.

Grading: The excavating, filling, or stockpiling of earth material, or any combination thereof, including the land in its excavated or filled condition.

Grubbing: removing or grinding of roots, stumps and other unwanted material below existing grade.

Grassed Waterway: A broad or shallow natural watercourse or constructed channel, covered with erosion-resistant grasses or similar vegetative cover, used to convey surface water.

Impervious: That which does not allow infiltration.

Landscape Architect: A Professional Landscape Architect registered in the State of Ohio.

Landslide: A rapid mass movement of soil and rock moving downhill under the influence of gravity.

Larger Common Plan of Development or Sale: A contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under one plan.

Maximum Extent Practicable (MEP): The technology-based discharge standard of Municipal Separate Storm Sewer Systems to reduce pollutants in storm water discharges that was established by the Clean Water Act 402(p). A discussion of MEP as it applies to small MS4s is found in 40 CFR 122.34.

Municipal Separate Storm Sewer System (MS4): A conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains) that are:

Owned or operated by the federal government, state, municipality, township, county, district, or other public body (created by or pursuant to state or federal law) including a special district under state law such as a sewer district, flood control district or drainage districts, or similar entity, or a designated and approved management agency under Section 208 of the Federal Water Pollution Control Act that discharges into surface waters of the state; and

Designed or used for collecting or conveying solely stormwater,

Which is not a combined sewer, and

Which is not part of a publicly owned treatment works.

Multi-family Development: Apartments, condominiums, duplexes or other similar buildings housing more than one family.

Natural Waterway: A waterway that is part of the natural topography, which usually maintains continuous or seasonal flow during the year and is characterized as being irregular in cross-sectionwith a meandering course.

NPDES: National Pollutant Discharge Elimination System, a regulatory program in the Federal Clean Water Act that prohibits the discharge of pollutants into surface waters of the United States without a permit.

Operator: Any party associated with a construction project that meets either of the following two criteria:

The party has operational control over construction plans and specifications, including the ability to make modifications to those plans and specifications; or

The party has day-to-day operational control of those activities at a project which are necessary to ensure compliance with a Stormwater Pollution Prevention Plan (SWP3) for the site or other permit conditions (e.g. they are authorized to direct workers at a site to carry out activities required by the SWP3 or comply with other permit conditions.

Owner or Operator: The owner or operator of any "facility or activity" subject to regulation under the NPDES program.

Parcel: Means a tract of land occupied or intended to be occupied by a use, building or group of buildings and their accessory uses and buildings as a unit, together with such open spaces and driveways as are provided and required. A parcel may contain more than one contiguous lot individually identified by a 'Permanent Parcel Number' assigned by the Lorain County Auditor'sOffice.

Percent Imperviousness: The impervious area created divided by the total area of the project site.

Permanent Stabilization: Establishment of permanent vegetation, decorative landscape, mulching, matting, sod, rip rap, and landscaping techniques to provide permanent erosion control on areas where construction operations are complete or where no further disturbance is expected for at least one year.

Person: An individual, corporation, firm, trust, commission, board, public or private partnership, joint venture, agency, unincorporated association, municipal corporation, county or state agency, federal government or any combination thereof.

Phasing: Clearing a parcel of land in distinct sections, with the stabilization of each section before the clearing of the next.

Point Source: Any discernible, confined and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or the floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural stormwater runoff.

Pre-Construction Meeting: A meeting between the Administrator and all principal parties, prior to the start of any construction, at a site that requires an Erosion Sediment Control Plan.

Pre-Winter Stabilization Meeting: A meeting between the Administrator and all principal parties,prior to October 1, in order to plan winter erosion and sediment controls for a site that requires anErosion Sediment Control Plan.

Professional Engineer: A Professional Engineer registered in the State of Ohio.

Qualified Inspection Personnel: A person knowledgeable in the principles and practice of erosion and sediment controls, who possess the skills to assess all conditions at the construction site that could impact stormwater quality and to assess the effectiveness of any sediment and erosion control measure selected to control the quality of stormwater discharges from the construction activity.

Rainwater and Land Development Manual: Ohio's standards for storm water management, land development, and urban stream protection. The most current edition of these standards shall be used with this regulation.

Riparian Area: The transition area between flow water and terrestrial (land) ecosystems composed of trees, shrubs and surrounding vegetation which serve to stabilize erodible soil, improve both surface and ground water quality, increase stream shading and enhance wildlife habitat.

Runoff: The portion of rainfall, melted snow, or irrigation water that flows across the ground surface and is eventually conveyed to water resources or wetlands.

Sediment: The soils or other surface materials that can be transported or deposited from its site of origin by the action of wind, water, ice or gravity as a product of erosion.

Sedimentation: The deposit of sediment in water bodies.

Sediment Basin: A temporary barrier or other suitable retention structure built across an area of water flow to intercept runoff and allow transported sediment to settle and be retained prior to discharge into waters of the State.

Sediment Pollution: The degradation of waters of the State by sediment as a result of failure to apply management or conservation practices to abate wind or water soil erosion, specifically in conjunction with soil-disturbing activities on land used or being developed for commercial, industrial, residential or other non-farm purposes.

Silviculture: The activity for which the primary purpose is the growing, managing and harvesting of a merchantable forest product of commercial species under accepted silvicultural systems through natural or artificial reforestation methods and for which there is an approved forest management plan.

Sloughing/Slumping: A slip or downward movement of an extended layer of soil resulting from the undermining action of water or the soil-disturbing activity of man.

Soil Conservation: The use of the soil within the limits of its physical characteristics and protecting it from unalterable limitations of climate and topography.

Soil-Disturbing Activity: A clearing, grading, excavating, filling or other alteration of the earth's surface where natural or man-made ground cover is destroyed, which may result in, or contribute to, erosion and sediment pollution. Grubbing and stump removal that occurs during clearing or timber activities constitutes a soil disturbing activity.

Soil and Water Conservation District: An entity organized under Chapter 1515 of the Ohio RevisedCode referring either to the Soil and Water Conservation District Board or its designated employee(s), hereinafter referred to as the Lorain SWCD.

Soil Loss: The soil moved from a given site by the forces of erosion, measured using "T."

Stabilization: The installation of vegetative and/or structural measures to establish a soil cover inorder to reduce soil erosion by storm water runoff, wind, ice, and gravity.

Stream or Watercourse: Shall have the same meaning as "water of the state" contained in O.R.C. 6111.01 and shall include all streams, lakes, ponds, marshes, watercourses, waterways, wells, springs irrigation systems, drainage systems, and other bodies or accumulations of water, surface and underground, natural or artificial, regardless of the depth of the strata in which underground water is located, that are situated wholly or partly within, or border upon, this state, or are within its jurisdiction, except those private waters that do not combine or effect a junction with natural surface or underground waters.

Storm Drain: A conduit, pipe or human-made structure, which serves to transport storm waterrunoff.

Storm Water Pollution Prevention Plan: (SWP3): The written document that sets forth the plans and practices to be used to meet the requirements of the NPDES permit.

Storm Water Runoff: The direct response of a watershed to precipitation, which includes the surface and subsurface runoff that enters a stream, ditch, storm sewer or other concentrated flow during and following the precipitation.

Subsoil: That portion of the soil below the topsoil or plow layer, beginning 6-12" below surface down to bedrock parent material.

Surface Waters of the State: Also, Water Resource or Water Body. Any stream, lake, reservoir, pond, marsh, wetland or other waterway situated wholly or partly within the boundaries of the state, except those private waters which do not combine or affect a junction with surface water. Waters defined as sewerage systems, treatment works or disposal systems in Section 6111.01 or the Ohio Revised Code are not included.

T: The soil loss tolerance expressed in tons per acre per year as determined by the USDA Revised Universal Soil Loss Equation (RUSLE).

Temporary Soil Erosion and Sediment Control Measures: Also, Temporary Stabilization. The establishment of temporary vegetation, mulching, geotextiles, sod, preservation of existing vegetation, and other techniques capable of quickly establishing cover over disturbed areas to provide erosion control between construction operations.

Topsoil: The upper layer of soil that is usually darker in color and richer in organic matter and nutrients than the subsoil.

Unstable Soils: A portion of land surface or area which is prone to slipping, sloughing, landslides or is identified by Natural Resource Conservation Service, USDA methodology as having low soil strength.

Water Quality Volume: (WQv) The volume of stormwater runoff which must be captured and treated prior to discharge from the developed site after construction is complete. WQv is based on the expected runoff

generated by the mean storm precipitation volume from post-construction site conditions at which rapidly diminishing returns in the number of runoff events captured begins to occur.

Water Resource: Also, Surface water of the state. Any stream, lake, reservoir, pond, marsh, wetland or other waterway situated wholly or partly within the boundaries of the state, except those private waters which do not combine or affect a junction with surface water. Waters defined as sewerage systems, treatment works or disposal systems in Section 6111.01 or the Ohio Revised Code are not included.

Watershed: The total drainage area contributing runoff to a single point.

Wetland: Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions, including swamps, marshes, bogs, and similar areas (40 CFR 232, as amended).

3. Regulated Activities.

No person shall cause or allow soil-disturbing activities, land clearing, grading, excavating or filling within the scope of these Rules without full compliance with the requirements set forth in these Rules and all applicable fees are paid.

3.1 When a proposed soil-disturbing activity on land used or being developed, either wholly or partially, for non-farm residential, commercial, industrial, or other non-farm purposes consisting of one or more contiguous acres of land owned by one person or operated as one development unit for the construction of non-farm buildings, structures, utilities, recreational areas or other limited non-farm uses, the owner of said land shall prepare and file with the Administrator an Erosion and Sediment Control (ESC) plan. Areas of less than one contiguous acre shall not be exempt from compliance with all other provisions of these Rules.

3.2 When a residential dwelling unit is proposed on an individual lot of one or more acres or a lot which is part of a large common plan of development, the owner of said land shall prepare and file with the Administrator an Abbreviated Erosion and Sediment Control (ESC) plan, which shall consist of items listed in Section 4.11 of this document. A copy of the Ohio EPA Notice of Intent orGeneral Permit authorization shall be provided.

3.3 When a residential dwelling unit on an individual lot is proposed, which is not part of a larger common plan of development and less than one-acre, the owner of said land shall not be required to prepare and file an Erosion and Sediment Control Plan; however, said owner shall comply with all other provisions of these Rules.

3.4 The submitted ESC plan must be approved by the Administrator of these Rules prior to the start of any soil-disturbing activity. The owner of said land shall notify the Administrator no less than two (2) working days before the start of soil-disturbing activity. The Administrator shall also be notified by the owner no later than two (2) working days after project completion. Failure to comply may result in the issuance of a stop work order, additional fees, and/or other adverse actions such as fines.

3.5 The ESC plan shall be submitted to the Administrator for review no less than thirty (30) working days prior to any soil-disturbing activity at the proposed site.

3.6 The ESC plan shall contain narrative and drawings that explain practices to be used to prevent soil erosion and off-site discharge of soil sediment during and after land development. (SeeSection 5 for plan requirements and review schedules.)

3.7 Erosion and sediment control practices used to satisfy the performance criteria of these Rules shall meet the specifications provided in the current edition of Rainwater & Land Development Manual, Ohio's Standards for Storm Water Management and Land Development, and UrbanStream Protection, published by the Ohio Department of Natural Resources and Provisions of the Lorain County Floodplain Regulations. (See Section 4 for performance standards and requirements.)

3.8 Approvals issued in accordance with this regulation do not relieve the applicant of responsibility for obtaining all other necessary permits and/or approvals from the Ohio EPA, the US Army Corps of Engineers, and other federal, state, and/or county agencies. If requirements vary, the most restrictive requirement shall prevail. These permits may include, but are not limited to, those listed below. All submittals required showing proof of compliance with these state and federal regulations shall be submitted with Erosion and Sediment Control Plans or Abbreviated Erosion and Sediment Control Plans to the Administrator.

(a) Ohio EPA NPDES Permits authorizing storm water discharges associated with construction activity or the most current version thereof: Proof of compliancewith these requirements shall be the applicant's Notice of Intent (NOI) number from Ohio EPA, a copy of the Ohio EPA Director's Authorization Letter for the NPDES Permit, or a letter from the site owner certifying and explaining why the NPDES Permit is not applicable.

(b) Section 401 of the Clean Water Act: Proof of compliance shall be a copy of the Ohio EPA Water Quality Certification application tracking number, public notice, project approval, or a letter from the site owner certifying that a qualified professional has surveyed the site and determined that Section 401 of the Clean Water Act is not applicable. Wetlands, and other waters of the United States,shall be delineated by protocols accepted by the U.S. Army Corps of Engineers at the time of application of this regulation.

(c) Ohio EPA Isolated Wetland Permit: Proof of compliance shall be a copy of Ohio EPA's Isolated Wetland Permit application tracking number, public notice,project approval, or a letter from the site owner certifying that a qualified professional has surveyed the site and determined that Ohio EPA's Isolated Wetlands Permit is not applicable. Isolated wetlands shall be delineated by protocols accepted by the U.S. Army Corps of Engineers at the time of application of this regulation.

(d) Section 404 of the Clean Water Act: Proof of compliance shall be a copy of the U.S. Army Corps of Engineers Individual Permit application, public notice, or project approval, if an Individual Permit is required for the development project. If an Individual Permit is not required, the site owner shall submit proof of compliance with the U.S. Army Corps of Engineer's Nationwide Permit Program. This shall include one of the following:

(1) A letter from the site owner certifying that a qualified professional has surveyed the site and determined that Section 404 of the Clean Water Act is not applicable.

(2) A site plan showing that any proposed fill of waters of the United States conforms to the general and special conditions specified in the applicable Nationwide Permit. Wetlands, and other waters of the United States, shall be delineated by protocols accepted by the U.S. Army Corps of Engineers at the time of application of this regulation.

(e) Ohio Dam Safety Law: Proof of compliance shall be a copy of the ODNR Division of Water permit application tracking number, a copy of the project approval letter from the ODNR Division of Water, or a letter from the site owner certifying and explaining why the Ohio Dam Safety Law is not applicable.

3.9 The ESC plan shall be certified by a professional engineer, professional surveyor or certified professional erosion and sediment control specialist or landscape architect registered in the State of Ohio.

3.10 The owner of said land and the developer, engineer and contractor of the project, and other principal parties, shall meet with the Administrator for a Pre-Construction Meeting no less than seven (7) days prior to soil-disturbing activity at the site in order to ensure that erosion and sediment control devices are properly installed, limits of disturbance and buffer areas are properly delineated and construction personnel are aware of such devices and areas. Pre-Construction Meetings for Abbreviated ESC Plans may be waived at the discretion of the Administrator.

3.11 The approved erosion and sediment control plan shall be kept at the development site and made available to contractors, site managers, inspectors, and the administrators of these regulations.

3.12 The project engineer shall perform first inspection of erosion and sediment control devices to certify that the 'as built' condition complies with the approved plan no less than two (2) working days prior of the start of the project. An inspection report shall be produced and kept at thedevelopment site and be made available to the Administrator within seven (7) working days from the date of inspection.

3.13 All project activity shall be subject to monitoring. A record of site inspections and compliance and non-compliance shall be maintained by the Administrator.

3.14 If the site is, or planned, to remain active through the winter months, a Pre-Winter Stabilization Meeting shall be held by the owner of said land and the developer, engineer and contractor of the project and the Administrator prior to October 1, in order to plan and approve winter erosion and sediment controls as defined in the most current edition of Rainwater and Land Development Manual Ohio's Standards for Storm Water Management and Land Development and Urban Stream Protection published by the Ohio Department of Natural Resources.

3.15 Upon completion of all construction and final stabilization of the entire construction site, theowner of said land shall contact the Administrator through written notification that construction is complete and final stabilization has been achieved.

4. Performance Standards

All properties adjacent to the site of soil-disturbing activity shall be protected from soil erosion and sediment run-off and damage, including, but not limited to, private properties, natural and artificial waterways, wetlands, storm sewers and public lands.

Construction site erosion and sediment control practices used to satisfy this requirement shall conform, as a minimum, to State of Ohio standards as set forth in the most-current edition of the *Rainwater and Land Development Manual* and shall conform to the most current Ohio Environmental Protection Agency, Ohio Revised Code Chapter 6111, requirements. The ESC Plan must meet the minimum requirements of the Ohio EPA's current General Storm Water permit. All SWP3 requirements listed in the General permit must also be met.

Erosion and sediment control plan approvals issued in accordance with these Rules do not relieve the owner of responsibility for obtaining all other necessary permits and/or approvals from federal, state and/or county agencies. If requirements vary, the most stringent requirement shall be followed.

Erosion and sediment control practices at the site, and as identified in the ESC plan, shall comply with the following:

The ESC Plan must contain a description of the controls appropriate for each construction operation and the applicant must implement such controls. The ESC Plan must clearly describe for each major construction activity the appropriate control measures; the general sequence during the construction process under which the measures will be implemented; and the contractor responsible for implementation (e.g., contractor A will clear land and install perimeter controls and contractor B will maintain perimeter controls until final stabilization). The controls shall include the following minimum components:

4.1 NON-STRUCTURAL PRESERVATION MEASURES: The ESC Plan must make use of practices that preserve the existing natural condition to the maximum extent practicable. Such practices include preserving riparian areas, reserving existing vegetation and vegetative buffer strips, phasing of construction operations in order to minimize the amount of disturbed land at any one time, minimizing disturbance of steep slopes, designation of tree preservation areas or other protective clearing or grubbing practices. Soil compaction shall be minimized and, unless infeasible, topsoil shall be preserved. Provide and maintain a 50-foot buffer of undisturbed natural vegetation around surface waters of the state, or riparian or wetland setbacks, if applicable, whichever is greater, unless maintaining this buffer is infeasible (e.g., stream crossings for roads or utilities, or for channel and floodplain rehabilitation and restoration). Direct stormwater to vegetated areas to increase sediment removal and maximize stormwater infiltration.

4.2 EROSION CONTROL PRACTICES: The ESC Plan must make use of erosion controls that are capable of providing cover over disturbed soils. The amount of soil exposed during construction activity shall be minimized. A description of control practices designed to re-stabilize disturbed areas after grading or construction shall be included in the ESC Plan. The ESC Plan must provide specifications for stabilization of all disturbed areas of the site and provide guidance as to which method of stabilization will be employed for any time of the year. Such practices may include: temporary seeding, permanent seeding, mulching, matting, sod stabilization, vegetative buffer strips, phasing of construction operations, the use of construction entrances, and the use of alternative ground cover.

Erosion control practices must meet the following requirements:

(a) Stabilization. Disturbed areas must be stabilized as specified in Tables 1 and 2 below.

Table 1: Permanent Stabilization

Area requiring permanent stabilization	Time frame to apply erosion controls
Any area that will lie dormant for one year or more.	Within 7 days of the most recent disturbance.
Any area within 50 feet of a watercourse or wetland and at final grade.	Within 2 days of reaching final grade.
Other areas at final grade.	Within 7 days of reaching final grade within that area.

Table 2: Temporary Stabilization

Area requiring temporary stabilization	Time frame to apply erosion controls
Any disturbed area within 50 feet of a watercourse or wetland and not at final grade.	Within 2 days of the most recent disturbance if that area will remain idle for more than 14 days.
Any disturbed area, including soil stockpiles that will be dormant for more than 14 days but less than one year, and not within 50 feet of a surface water of the state.	Within 7 days of the most recent disturbance within the area. For residential subdivisions, disturbed areas must be stabilized at least 7 days prior to transfer of ownership or operational responsibility.
Disturbed areas that will be idle over winter.	Prior to November 1 or the onset of winter weather, whichever occurs first.
Note: Where vegetative stabilization techniques may cause structural instability or are otherwise unobtainable, alternative stabilization techniques must be employed. These techniques may include mulching or erosion matting.	

(b) Permanent stabilization of conveyance channels. Applicants shall under takespecial measures to stabilize channels and outfalls and prevent erosive flows. Measures may include seeding, dormant seeding, mulching, erosion control matting, sodding, riprap, natural channel design with bioengineering techniques, or rock check dams, all as defined in the most recent edition of Rainwater and Land Development Manual or the Field Office Technical Guide available at http://epa.ohio.gov/dsw/storm/technical_guidance.

4.3 RUNOFF CONTROL PRACTICES. The ESC Plan shall incorporate measures that control the volume and velocity of stormwater runoff within the site to prevent erosion. Peak flow rates and total stormwater volume shall be controlled to minimize erosion and outlets, downstream channel and streambank erosion. Such practices may include rock check dams, pipe slope drains, diversions to direct flow away from exposed soils and protective grading practices. These practices shall divert runoff away from disturbed areas and steep slopes where practicable. Velocity dissipation devices shall be placed at discharge locations and along the length of any outfall channel to provide non-erosive flow velocity from the structure to a water course so that the natural physical and biological characteristics and functions are maintained and protected.

4.4 SEDIMENT CONTROL PRACTICES. The ESC Plan shall include a description of, and detailed drawings for, all structural practices that shall store runoff, allowing sediments to settle and/or divert flows away from exposed soils or otherwise limit runoff from exposed areas to minimize sediment discharges from the site. Structural practices shall be used to control erosion and trap sediment from a site remaining disturbed for more than 14 days. Such practices may include, among others: sediment settling ponds, silt fences, storm drain inlet protection, and earth diversion dikes or channels which direct runoff to a sediment settling pond. All sediment control practices must be capable of ponding runoff in order to be considered functional. Earth diversion dikes or channels alone are not considered a sediment control practice unless used in conjunction with a sediment settling pond.

Sediment control practices must meet the following requirements:

(a) Timing. Sediment control structures shall be functional throughout the course of earth disturbing activity. Sediment basins and perimeter sediment barriers shall be implemented prior to grading and within seven (7) days from the start ofgrubbing. They shall continue to function until the up-slope development area is re-stabilized. As construction progresses and the topography is altered, appropriate controls must be constructed, or existing controls altered to addressthe changing drainage patterns.

Sediment settling ponds. Sediment settling ponds shall be provided in the form of a sediment trap or sediment basin as defined in the latest edition of *Rainwater and Land Development*. The maximum allowable contributing drainage area to a sediment trap shall be limited to less than 5 acres. Contributing drainage areas of 5 acres or more shall be treated with a sediment basin. An equivalent best management practice may be utilized upon approval from the Lorain County Stormwater Management District.

The sediment-settling pond shall provide both a sediment storage zone and a dewatering zone. The volume of the dewatering zone shall be at least 1,800 cubic feet of storage per acre of total contributing drainage area. The dewatering structure of sediment basins shall be designed to have a minimum 48-hour drain time, and, unless infeasible, be designed to always withdraw runoff from the surface of the pond throughout the storm cycle. As such, a skimmer discharge device consistent with *Rainwater and Land Development* shall be provided to dewater sediment basins. Sediment traps shall also provide both a sediment storage zone and dewatering zone, but the outlet structure shall be constructed consistent with the specifications contained in the latest edition of *Rainwater and Land Development*.

When post-construction detention/water quality ponds are to be used as temporary sediment trapping BMPs, a skimmer discharge device consistent with *Rainwater and Land Development* shall be utilized during construction phase and until the site is deemed permanently stabilized by the Administrator.

The skimmer shall be designed per the equivalent requirements of sediment basins and the operator must ensure that the outlet structure of the pond provides an equivalent or better sediment storage zone and dewatering zone. As such, temporarily while the site is under construction, there shall be no discharge of runoff below the elevation required for the sediment storage zone and the discharge of stormwater within the dewatering zone shall only occur through the skimmer.

The volume of the sediment storage zone shall be calculated by one of the following methods:

> Method 1: The volume of the sediment storage zone shall be $1000 ft^3$ per disturbed acre within the watershed of the basin.
>
> Method 2: The volume of the sediment storage zone shall be the volume necessary to store the sediment as calculated with RUSLE or other generally accepted erosion prediction model.

When determining the total contributing drainage area, off-site areas and areas which remain undisturbed by construction activity must be included unless runoff from these areas is diverted away from the sediment settling pond and is not co-mingled with sediment-laden runoff. The depth of the dewatering zone must be less than or equal to five (5) feet. The configuration between the inlets and the outlet of the sediment-settling pond must provide at least two units of length for each one unit of width $\geq$ 2:1 length-to-width ratio; however, a length to width ratio of $\geq$ 4:1 is recommended. Sediment must be removed from the sediment-settling pond when the design capacity of the sediment storage zone has been completely filled by sediment accumulations. This limit is typically reached when sediment occupies one-half of the basin depth. When designing sediment settling ponds, the applicant must consider public safety, especially as it relates to children, as a design factor for the sediment basin and alternative sediment controls must be used where site limitations would preclude a safe design. The use of a combination of sediment and erosion control measures in order to achieve maximum pollutant removal is encouraged.

(b) Silt fence and diversions. Sheet flow runoff from denuded areas shall be intercepted by silt fence or diversions to protect adjacent properties, water resources, and wetlands from sediment transported via sheet flow. Where intended to provide sediment control, silt fence shall be placed on a level contour and shall be capable of temporarily ponding runoff. The relationship between the maximum drainage area to silt fence for a particular slope range is shown in Table 3 below. Placing silt fence in a parallel series does not extend the size of the permissible drainage area. Stormwater diversion practices shall be used to keep runoff away from disturbed areas and steep slopes. Such devices, which include swales, dikes or berms, may receive storm water runoff from areas up to 10 acres.

Table 3: Maximum Drainage Area to Silt Fence

Maximum Drainage Area (acres) to 100 linear feet of silt fence	Range of Slope for a drainage area (%)
0.5	< 2%
0.25	≥ 2% but < 20%
0.125	≥ 20% but < 50%

Silt fence or similar perimeter controls shall not be implemented where the slope is greater than 50%; instead water should be collected and conveyed to a sediment settling pond. Where slopes are greater than 50% adjacent to water resources,
the use of erosion controls shall be emphasized.

(c) Inlet protection. Erosion and sediment control practices, such as boxed inlet protection, shall be installed to minimize sediment-laden water entering active storm drain systems. All inlets receiving runoff from drainage areas of one or more acres will require a sediment settling pond. Straw or hay bales and filter socks around catch basins are not acceptable forms of inlet protection.

(d) Off-site tracking of sediment and dust control. Best management practices must be implemented to ensure sediment is not tracked off-site and that dust is controlled. These best management practices must include, but are not limited to, the following:

1. Construction entrances shall be built and shall serve as the only permitted points of ingress and egress to the development area. These entrances shall be built of a stabilized pad of aggregate stone or recycled concrete or cement sized greater than 2" in diameter, placed over a geotextile fabric, and constructed in conformance with specifications in the most recent edition of the Rainwater and Land Development Manual. Construction entrances shall be installed prior to the commencement of any soil disturbing activity.

2. Streets and catch basins adjacent to construction entrances shall be kept free of sediment tracked off site. Streets directly adjacent to construction entrances and receiving traffic from the development area, shall be cleaned daily to remove sedimenttracked off-site. If applicable, the catch basins on these streets nearest to the construction entrances shall also be cleaned weekly and protected from sediment-laden runoff, if feasible without posing a public safety hazard.

Based on site conditions the Administrator may require additional best management practices to control off site tracking and dust. These additional BMPs may include:

1. Silt fence or construction fence installed around the perimeter of the development area to ensure that all vehicle traffic adheres to designated construction entrances.

2. Designated wheel-washing areas. Wash water from these areas must be directed to a designated sediment trap, the sediment-settling pond, or to a sump pump for dewatering in conformance with Section 4.7 of this regulation.

3. Applicants shall take all necessary measures to comply with applicable regulations regarding fugitive dust emissions, including obtaining necessary permits for such emissions. The Administrator may require dust controls including the use of water trucks to wet disturbed areas, tarping stockpiles, temporary stabilization of disturbed areas, and regulation of the speed of vehicles on the site.

(e) Surface Waters of the State protection. Construction vehicles shall avoid water resources. A 50-foot undisturbed natural buffer shall be provided around surface waters of the state unless infeasible. If it is infeasible to provide and maintain an undisturbed 50-foot natural buffer, the ESC plan shall comply with the stabilization requirements for areas within 50 feet of a surface water and minimize soil compaction and, unless infeasible, preserve topsoil. If the applicant is permitted to disturb areas within 50 feet of a water resource or wetland, the following conditions shall be addressed in the ESC Plan:

1. All BMPs and stream crossings shall be designed as specified in the most recent edition of the Rainwater and Land Development Manual.

2. Structural practices shall be designated and implemented on site to protect water resources or wetlands from the impacts of sedimentrunoff. A 25-foot minimum setback for riparian and wetlands isrequired.. A 25-foot minimum setback on all sides must be maintained as a permanent buffer and protected with construction fence until final site stabilization occurs except as otherwise provided in Subsection F.

3. No structural sediment controls (e.g., the installation of silt fence or a sediment settling pond in-stream) shall be used in a water resource, wetland or floodplain.

4. Where stream crossings for roads or utilities are necessary and permitted, the project shall be designed such that the number of stream crossings and the width of the disturbance are minimized.

5. Temporary stream crossings shall be constructed if water resources or wetlands will be crossed by construction vehicles during construction.

6. Construction of bridges, culverts, or sediment control structures shall not place soil, debris, or other particulate material into or close to the water resources or wetlands in such a manner that it may slough,slip, or erode.

7. Concentrated stormwater runoff from BMPs to natural wetlands shall be converted to diffuse flow through the use of level spreaders or other such appropriate measure before the runoff enters the wetlands. The flow should be released such that no erosion occurs downslope. Level spreaders may need to be placed in series to ensure non-erosive velocities.

8. Protected areas or critical areas, including wetlands and riparian areas shall be physically

marked in the field prior to earth disturbing activities.

(f) Modifying controls. If periodic inspections or other information indicates a control has been used inappropriately or incorrectly, the applicant shall replace or modify the control for site conditions.

4.5 NON-SEDIMENT POLLUTANT CONTROLS: No solid or liquid waste, including building materials, shall be discharged in storm water runoff. The applicant must implement site best management practices to prevent toxic materials, hazardous materials, or other debris from entering water resources, wetlands or the MS4. These practices shall include but are not limited to the following:

(a) Waste Materials: A covered dumpster shall be made available for the proper disposal of garbage, plaster, drywall, grout, gypsum, and other waste materials.

(b) Concrete Truck Wash Out: The washing of concrete material into a street, catch basin, other public facility, natural resource or water of the state is prohibited. A designated area for concrete washout shall be provided and clearly marked for usage.

(c) Disposal of Other Wastewaters: The discharge of washout and cleanout of stucco, paint, form release oils, curing compounds, and other construction materials to a street, catch basin, other public facility, natural resource or waters of the state is prohibited. The discharge of soaps or solvents used in vehicle and equipment washing is also prohibited. If generated, these wastewaters must be collected and disposed of properly.

(d) Fuel/Liquid Tank Storage: All fuel/liquid tanks and drums shall be stored in a marked storage area. A dike shall be constructed around this storage area with a minimum capacity equal to 110% of the volume of all containers in the storage area.

(e) Toxic or Hazardous Waste Disposal: Any toxic or hazardous waste shall be disposed of properly.

(f) Contaminated Soils Disposal and Runoff: Discovery of previously unknown contaminated soils onsite shall be self-reported to Ohio EPA and local authorities. Contaminated soils from redevelopment sites shall be disposed of properly. Runoff from contaminated soils shall not be discharged from the site. Proper permits shall be obtained for development projects on solid waste landfill sites or redevelopment sites. Where construction activities are to occur on sites with contamination from previous activities, operators shall be aware that concentrations of materials that meet other criteria (i.e. not considered a Hazardous Waste, meeting Voluntary Action Program (VAP standards)) may still result in stormwater discharges in excess of Ohio Water Quality Standards. Such discharges are not authorized by this code. Control measures which may be utilized to meet this requirement include, but are not limited to:

(1) Use berms, trenches, pits or tanks to collect contaminated runoff and prevent discharge.

(2) Pump runoff from contaminated soils to the sanitary sewer with the prior approval of the sanitary sewer system operator, or pump into a container for transport to an appropriate treatment or disposal facility; and

(3) Cover areas of contamination with tarps, daily cover or other such methods to prevent storm water from coming into contact with contaminated materials.

The SWP3 must include methods to minimize the exposure of building materials,

building products, construction wastes, trash, landscape materials, fertilizers, pesticides, herbicides, detergents, and sanitary waste to precipitation, stormwater runoff, and snow melt. The SWP3 shall include measures to prevent and respond to chemical spills and leaks. Applicants may also reference the existence of other plans (i.e., Spill Prevention Control and Countermeasure (SPCC) plans, spill control programs, Safety Response Plans, etc.) provided that such plan addresses this requirement and a copy of such plan is maintained on site.

(g) Restroom facilities must be provided for site workers during all phases of construction.

4.6 COMPLIANCE WITH OTHER REQUIREMENTS. The ESC Plan shall be consistent with applicable State and/or local waste disposal, sanitary sewer, orseptic system regulations, including provisions prohibiting waste disposal byopen burning, and shall provide for the proper disposal of contaminated soilslocated within the development area.

4.7 TRENCH AND GROUND WATER CONTROL. There shall be no sediment- laden or turbid discharges to water resources or wetlands resulting from dewatering activities. If trench or ground water contains sediment, it must pass through a sediment-settling pond or other equally effective sediment control device, prior to being discharged from the construction site. Alternatively, sediment may be removed by settling in place or by dewatering into a sump pit, filter bag or comparable practice. Ground water dewatering which does not contain sediment or other pollutants is not required to be treated prior to discharge. However, care must be taken when discharging ground water to ensure that it does not become pollutant-laden by traversing over disturbed soils or other pollutant sources.

4.8 INTERNAL INSPECTIONS. At a minimum, procedures in an ESC Plan shall provide that all controls on the site are inspected at least once every seven calendar days and within 24-hours after any storm event greater than one-half inch of rain per 24-hour period. The inspection frequency may be reduced to at least one every month if the entire site is temporarily stabilized or runoff is unlikely due to weather conditions (e.g., site is covered with snow, ice, or theground is frozen). A waiver of inspection requirements is available until one month before following conditions are expected to result in a discharge if all of the following conditions are met: the project is located in an area where frozen conditions are anticipated to continue for extended periods of time (i.e., morethan one month); land disturbance activities have been suspended; and the beginning and ending dates of the waiver period are documented in the ESC Plan.

Once a definable area has been finally stabilized, you may mark this on your SWP3 and no further inspection requirements apply to that portion of thesite. The applicant shall assign "qualified inspection personnel" to conduct these inspections to ensure that the control practices are functional and to evaluatewhether the ESC Plan is adequate and properly implemented in accordance with the schedule proposed herein or whether additional control measures are required.

Following each inspection, a checklist must be completed and signed by the qualified inspection personnel representative. At a minimum, the inspection report must include:

1) the inspection date;

2) names, titles, and qualifications of personnel make the inspections;

3) weather information for the period since the last inspection (or since commencement of construction activities if the first inspection) including a best estimate of the beginning of each storm event, duration of each storm event, approximate amount of rainfall or each storm event (in inches), and whether any discharges occurred;

4) weather information and a description of any discharges occurring at the time of the inspection;

5) location(s) of discharges of sediment or other pollutants from the site;

6) location(s) of BMP's that need to be maintained;

7) locations(s) of BMP's that failed to operate as designed or proved inadequate for a particular location;

8) location(s) where additional BMP's are needed that did not exist at the time of inspection; and

9) corrective action required including any changes to the ESC Plan necessary with implementation dates.

These inspections shall meet the following requirements:

1) Disturbed areas and areas used for storage of materials that are exposed to precipitation shall be inspected for evidence of, or the potential for, pollutants entering the drainage system.

2) Erosion and sediment control measures identified in the ESC Plan shall be observed to ensure that they are operating correctly. The applicant shall utilize an inspection form to be provided by the Administrator or an alternate form acceptable to the Administrator.

3) Discharge locations shall be inspected to determine whether erosion and sediment control measures are effective in preventing significant impacts to the receiving water resource or wetlands.

4) Locations where vehicles enter or exit the site shall be inspected for evidence of off-site vehicle tracking.

5) The applicant shall maintain for three (3) years following final stabilization the results of these inspections, the names and qualifications of personnel making the inspections, the dates of inspections, major observations relating to the implementation of the ESC Plan, a certification as to whether the facility is in compliance with the ESC Plan, and information on any incidents of non-compliance determined by these inspections.

4.9 MAINTENANCE. The ESC Plan shall be designed to minimize maintenance requirements. All control practices shall be maintained and repaired as needed to ensure continued performance of their intended function until final stabilization. All sediment control practices must be maintained in a functional condition until all up-slope areas they control reach final stabilization. The applicant shall provide a description of maintenance procedures needed to ensure the continued performance of control practices and shall ensure a responsible party and adequate funding to conduct this maintenance.

When inspections reveal the need for repair, replacement, or installation of erosion and sediment control BMPs, the following procedures shall be followed:

(a) <u>When practices require repair or maintenance.</u> If an internal inspection reveals that a control practice is in need of repair or maintenance, with the exception of a sediment-settling pond, it

must be repaired or maintained within three (3) days of the inspection. Sediment settling ponds must be repaired or maintained within ten (10) days of the inspection.

(b) When practices fail to provide their intended function. If an internal inspection reveals that a control practice fails to perform its intended function as detailed in the ESC plan and that another, more appropriate control practice is required, the ESC plan must be amended, and the new control practice must be installed within ten (10) days of the inspection.

(c) When practices depicted on the ESC Plan are not installed. If an internal inspection reveals that a control practice has not been implemented in accordance with the schedule, the control practice must be implemented within ten (10) days from the date of the inspection. If the internal inspection reveals that the planned control practice is not needed, the record must contain a statement of explanation as to why the control practice is not needed.

4.10 FINAL STABLIZATION. Final stabilization shall be determined by the Administrator. "Final stabilization" means that either:

1) All soil disturbing activities at the site are completed and a uniform perennial vegetative cover (e.g., evenly distributed, without large bare areas) with a density of at least 70 percent cover for the areas has been established on all unpaved areas and areas not covered by permanent structures or equivalent stabilization measures (such as the use of landscape mulches, rip- rap, gabions or geotextile) have been employed. In addition, all temporary erosion and sediment control practices are removed and disposed of and all trapped sediment is permanently stabilized to prevent further erosion; or

2) For individual lots in residential construction by either:

    a) The homeowner completing final stabilization as specified above; or

    b) The homeowner establishing temporary stabilization including perimeter controls for an individual lot prior to occupation of the home by the homeowner and informing the homeowner on the need for and benefits of, final stabilization; or

3) For construction projects on land used for agricultural purposes (e.g., pipelines across crop or rangeland), final stabilization may be accomplished by returning the disturbed land to its pre-construction agricultural use.Areas disturbed that were previously used for agricultural activities, such as buffer strips immediately adjacent to surface waters of the state and which are not being returned to their pre-construction agricultural use, must meet the final stabilization criteria in (1) or (2) above.

4.11 ABBREVIATED EROSION AND SEDIMENT CONTROL PLAN.

(a) Any Abbreviated ESC Plan which does not follow the model provided by the Lorain Soil & Water Conservation District must be designed by a certifiedengineer, landscape architect, surveyor or erosion and sediment controlspecialist. In order to control sediment pollution of water resources andwetlands, the applicant shall submit an Abbreviated ESC Plan in accordance with the requirements of this regulation. Said plan shall contain the minimum requirements set forth in (c) hereafter and substantially conformwith the model developed by the Administrator.

(b) The Administrator may require re-submission of any plan which does notcomply with this section.

(c) The Abbreviated ESC Plan shall include a minimum of the following BMPs. The Administrator may require other BMPs as site conditions warrant.

1. Construction Entrances: Construction entrances shall be built and shall serve as the only permitted points of ingress and egress to the development area.These entrances shall be built of a stabilized pad of aggregate stone or recycled concrete sized greater than 2" in diameter, placed over a geotextile fabric, and constructed in conformance with specifications in the most recent edition of the Rainwater and Land Development Manual.

2. Concrete Truck Wash Out: The washing of concrete material into a street,catch basin, or other public facility or natural resource is prohibited. A designated area for concrete washout shall be indicated on the plan. Use for other waste and wastewater is prohibited.

3. Street Sweeping: Streets directly adjacent to construction entrances and receiving traffic from the development area shall be cleaned daily to remove sediment tracked off-site. If applicable, the catch basins on these streets nearest to the construction entrances shall be cleaned weekly.

4. Stabilization: The development area shall be stabilized as detailed in Table 4.

Table 4: Stabilization

Area	Time frame to apply
Any disturbed area within 50 feet of a watercourse or	Within 2 days of the most recent disturbance if that area will remain idle for more than 14 days
For all construction activities, any disturbed area, including soil	Within 7 days of the most recent disturbance within the area
Disturbed areas that will be idle over winter	Prior to November 1.
Note: Where vegetative stabilization techniques may cause structural instability or are otherwise unobtainable, alternative stabilization techniques must be employed. These techniques may include mulching or erosion matting.	

5. Silt Fence or Other Approved Perimeter Barriers: Shall be placed along the down slope of any disturbed areas and along any water resources.

6. Inlet Protection. Erosion and sediment control practices, such as boxed inlet protection, shall be installed to minimize sediment-laden water entering active storm drain systems, including rear yard inlets. Straw, hay bales, and filter socks are not acceptable forms of inlet protection.

7. Internal Inspection and Maintenance. All controls on the development area shall be inspected at least once every seven-calendar days and within 24hours after any storm event greater than one-half inch of rain per 24-hour period. Maintenance shall occur as detailed below:

   A. When practices require repair or maintenance. If the internal inspection reveals that a control practice is in need of repair or maintenance, with the exception of a sediment-settling pond, itmust be repaired or maintained within three (3) days of the inspection. Sediment settling ponds must be repaired or maintained within ten (10) days of the inspection.

B. When practices fail to provide their intended function. If the internal inspection reveals that a control practice fails to perform its intended function and that another, more appropriate control practice is required, the Abbreviated ESC Plan must be amended, and the new control practice must be installed within ten (10)days of the inspection.

C. When practices depicted on the Abbreviated ESC Plan are not installed. If the internal inspection reveals that a control practice has not been implemented in accordance with the schedule, the control practice must be implemented within ten (10) days from the date of the inspection. If the inspection reveals that the planned control practice is not needed, the record must contain a statement of explanation as to why the control practice is not needed.

8. Final Stabilization: Final stabilization shall be determined by the Administrator in accordance with Section 4.10.

5. Application Procedures for ESC Plan

The ESC Plan for development projects shall be submitted to the Administrator after the approval of the preliminary plans and prior to the approval of improvement plans or drawings by the Lorain County Planning Commission in the case of subdivisions; concurrently with the submittal of construction drawings to the Lorain County Engineer or Township Zoning Inspector in the case of other construction projects; and thirty (30) working days prior to any soil-disturbing activity for general clearing projects.

The Administrator shall review the ESC plan and approve or return for revision with comments and recommendations for revision, within twenty-one (21) working days after receipt of said plan. A plan rejected because of deficiencies shall receive a narrative report stating specific problems and the procedure for filing a revised plan. At the time of receipt of a revised plan, another 21-day review period shall be commenced.

Approved plans shall remain valid for two years from the date of approval. A copy of the approved plan and its review report shall be forwarded by the Administrator to the Lorain Soil & Water Conservation District, County Planning Commission, and County Engineer.

A plan is considered complete when it contains two sets of the following:

5.1 **Site construction plans** intended for contractor's bid.

5.2 **Contact information** for the owner of the land, the developer and project engineer; project engineer's certification; project name; and, project vicinity map.

5.3 **Permit Verification**

(a) Jurisdictional Wetlands: In areas where jurisdictional wetlands as defined by an on-site delineation verified by the United States Army Corps of Engineers will be affected, a copy of the wetland delineation report shall be submitted with the ESC Plan. If an Individual Permit is required, a copy of that Permit, showing project approval and any restrictions that apply to site activities, shall also be submitted. If an Individual Permit is not required for the proposed project, the site owner shall submit proof of compliancewith the Nationwide Permit Program as detailed under Section 3.8. If an Ohio EPASection 401 Water Quality Certification and/or an Ohio EPA Isolated Wetland Permit is required, the site owner shall submit proof of compliance with the Ohio EPA WaterQuality Certification and/or Isolated

Wetland Permit program as detailed in Section 3.8.

(b) An Ohio Environmental Protection Agency (OEPA) National Pollutant Discharge Elimination System permit with permit verification number or Notice of Intent shall be submitted with the ESC Plan.

5.4 Project Description: A brief description of the project and types of soil-disturbing activities.Note specifically items not self-evident from the plan drawings. The project description shall list total project acreage, north arrow and adjacent property boundaries.

(1) Site description: The ESC Plan shall provide:

A. A description of the nature and type of the construction activity (e.g. residential, shopping mall, highway, etc.).

B. Total area of the site and the area of the site that is expected to be disturbed (i.e., grubbing, clearing, excavation, filling or grading, including off-site borrowareas).

C. Existing data describing the soil and, if available, the quality of any known pollutant discharge from the site such as that which may result from previous contamination caused by prior land uses.

D. A description of prior land uses at the site.

E. An implementation schedule which describes the sequence of major soil- disturbing operations (i.e., grubbing, excavating, grading, utilities and infrastructure installation) and the implementation of erosion and sediment controls to be employed during each operation of the sequence.

F. The location and name of the immediate receiving stream or surface water(s) and the first subsequent receiving water(s).

G. The aerial (plan view) extent and description of wetlands or other special aquatic sites at or near the site which will be disturbed, or which will receive discharges from disturbed areas of the project.

H. For subdivided developments where the ESC Plan does not call for a centralized sediment control capable of controlling multiple individual lots, a detail drawing of a typical individual lot showing standard individual lot erosion and sediment control practices.

I. Site map showing:

i. Limits of soil-disturbing activity of the site, including off site spoil and borrow areas.

ii. Soils types should be depicted for all areas of the site, including locations of unstable or highly erodible soils.

iii. Existing and proposed one-foot (1') contours. This must include a delineation of drainage watersheds expected during and after major grading activities as well as the size of each drainage watershed in acres.

iv. Surface water locations including springs, wetlands, streams, lakes, water wells,

etc., on or within 200 feet of the site, including the boundaries of wetlands or stream channels and first subsequent named receiving water(s) the applicant intends to fill or relocate for which the applicant is seeking approval from the Army Corps of Engineers and/or Ohio EPA.

v. Existing and planned locations of buildings, roads, parking facilities, utilities and easements.

vi. The location of all erosion and sediment control practices, including the location of areas likely to require temporary stabilization during the course of site development.

vii. Sediment ponds, including their sediment settling volume and contributing drainage area.

viii. Areas designated for the storage or disposal of solid, sanitary and toxic wastes, including dumpster areas, areas designated for concrete truck washout, and vehicle fueling.

ix. The location of designated stoned construction entrances where the vehicles will ingress and egress the construction site.

x. The location of any in-stream activities including stream crossings.

xi. Location and identification of all permanent post-construction BMP's.

5.5 **Existing site conditions** shown with maximum scale of 1"=200' and 2' contour intervals; locations and names of soil type boundaries, vegetation, ditches, springs, streams, lakes, wetlands, woods, agricultural fields; location of downstream lakes and wetlands within 1000' of project; and, existing drainage patterns including direction of flow and watershed acreage.

5.6 **Grading plan** showing types of soils and boundaries; limits of disturbance; areas of excavation and fill; final contours; and, proposed drainage pattern including storm sewer inlets and permanent storm water basins. Basin detail shall be drawn to scale and show volumes and size of contributing drainage area.

5.7 **Erosion and Sediment Control plan** showing location, type and construction detail for perimeter controls; sediment settling devices; limits of disturbance; buffers for streams, wetlands, ponds and drainages; seeding mixtures and rates; and, type and quantity of mulching; application of water or fertilizer. Erosion and Sediment Control plans shall also provide a detailed construction sequence. Updates and/or corrections to schedules and/or sequencing shall be clearly marked or listed on approved plans, which shall be located at the site.

5.8 **Storm Water Control Methods** adequate to prevent pollution of public waters by soil sediment from accelerated storm water runoff from development areas.

5.9 **Contractor's Construction Sequence** that estimates the time frame required for the following:

(a) Pre-Construction meeting.

(b) Initial clearing and grubbing to gain access and installation of perimeter controls within seven (7) days of clearing and grubbing.

(c) Clearing and grubbing followed by excavation of sediment traps and basins and temporary soil stabilization for these sediment settling devices within seven (7) days of excavation.

(d) Project engineer's initial inspection of erosion and sediment controls for "as-built" certification.

(e) Maintenance inspection schedule and party responsible for inspection and repair of erosion and sediment control devices.

(f) Pre-Winter Stabilization meeting if project is to be through the winter.

(g) Final grading and permanent soil stabilization within seven (7) days of finishing final grade.

(h) Removal of temporary sediment control devices. The construction maintenance guarantee shall not be released until all temporary devices are removed; properly disposed of and trapped sediment has been stabilized or removed.

5.10 **Review and Inspection Fee** shall be submitted with the Erosion and Sediment Control Plan.ESC Plans shall not be reviewed until the fee has been paid. The fee is based on project size and paid by the owner or developer directly to the Administrator. The review and inspection fee shall be established by the Board of Lorain County Commissioners by Resolution. Payment is made payable to Lorain County Commissioners.

6. Monitoring for Compliance: Enforcement

6.1 Following the initial inspection of erosion and sediment control devices by the project engineer, regular inspections will be performed by the Administrator for compliance with these Rules. If it appears that a violation of any of these Rules has occurred, the owner and developer will be notified of deficiencies or noncompliance in writing by certified mail, return receipt requested.

6.2 The rules shall be enforced in accordance with O.R.C. 309.79 and at a minimum shall permit: The Board of County Commissioners or any duly authorized representative of the Board may, upon identification to the owner or person in charge, enter any land upon obtaining agreement with the owner, tenant, or manager of the land in order to determine whether there is compliance with the rules adopted under this section. If the Board or its duly authorized representative is unable to obtain such an agreement, the Board or representative may apply for, and a judge of the Lorain County Common Pleas Court inspection warrant as necessary to achieve the purposes of this chapter.

1. If the Board of County Commissioners or its duly authorized representative determines that a violation of the rules adopted under this section exists, the Board or representative may issue an immediate stop work order if the violator failed to obtain any federal, state or local permit necessary for sediment and erosion control, earth movement, clearing, or cut and fill activity. In addition, if the Board or representative determines such a rule violation exists, regardless of whether or not the violator has obtained the proper permits, the Board or representative may authorize the issuance of a notice of violation. If, after a period of not less than thirty – (30) days has elapsed following the issuance of the notice of violation, the violation continues, the Board or its duly authorized representative shall issue a second notice of violation. Except as provided in division Subsection (3) of this section, if after a period of not less than fifteen

(15) days has elapsed following theissuance of the second notice of violation, the violation continues, the Board or its duly authorized representative may issue a stop work order after first obtaining the written approval of the prosecuting attorney of the county if, in the opinion of the prosecuting attorney, the violation is egregious.

Once a stop work order is issued, the Board or duly authorized representative shall request, in writing, the prosecuting attorney of the county to seek an injunction or other appropriate relief in the court of common pleas to abate excessive sedimentation and secure compliance with the rules adopted under this section. If the prosecuting attorney seeks an injunction or other appropriate relief, then, in granting relief, the Court of Common Pleas may order the construction of sediment control improvements or implementation of other control measure and may assess a civil fine of not less than one hundred or more than five hundred dollars. Each day of violation of a rule or stop work order issued under this section shall be considered a separate violation subject to a civil fine.

2. The person to who a stop work order is issued under this section may appeal the order to Lorain County Common Pleas Court issued, seeking any equitable or other appropriate relief from that order.

3. No stop work order shall be issued under this section against any public highway transportation, or drainage improvement or maintenance project undertaken by a government agency or political subdivision in accordance with a statement of its standard sediment control policies that is approved by the Board or the Chief of the Division of Soil and Water Conservation, Ohio Department of Natural Resources.

The Administrator shall have the authority to require immediate on-site adjustments to the ESC Plan in order to achieve compliance with these Rules.

A final inspection will be made to determine if the criteria of these Rules have been satisfied and a report will be presented to the Board of Lorain County Commissioners on the site's compliance status.

The Administrator will monitor soil-disturbing activities for non-farm residential, commercial, industrial, or other non-farm purposes on land of less than one contiguous acre to ensure compliance required bythese Rules.

The Administrator shall notify the U.S. Army Corps of Engineers when there is a violation on a development project covered by an Individual or Nationwide Permit. The Administrator shall notify the Ohio Environmental Protection Agency when there is a violation on a development project covered by a Section 401 Water Quality Certification and/or Isolated Wetland Permit.

The Administrator shall not review or approve erosion and sediment control plans, of any type, for applicants that have an existing development project or site(s) that is not in compliance with its approved erosion and sediment control plan, or a project site(s) that is otherwise not in compliance with the Lorain County Erosion and Sediment Control Rules.

The Administrator shall not review or approve Erosion and Sediment Control Plans for sub-lots or other areas within existing development projects that are not in compliance with its approved Erosion and Sediment Control Plan or otherwise not in compliance with the Lorain County Erosion and Sediment Control Rules. Such development projects include but not limited to, subdivisions or other common plans of development

The County of Lorain reserves the right to withhold relevant inspections and/or other approvals from its

departments and/or agencies for development projects or activities in support of development projects that are not in compliance with these Rules.

The County shall not issue building permits for projects regulated under the Lorain County Erosion and Sediment Control Rules that have not received approval for an Erosion and Sediment Control Plan forsaid project(s).

7. Variances to Rules

The Lorain County Board of Commissioners, or its designated agent, may grant a variance to these Rules if all of the following are found to exist:

(a) There are exceptional or extraordinary circumstances or conditions applying to the land.

(b) Literal enforcement of the Rules would cause undue hardship or practical difficulties. The standards shall have the same general meaning as applied in zoning variances.

(c) The exceptional or extraordinary circumstances or conditions and the undue hardship or practical difficulties were not the result of any prior actions of the owner of the land.

(d) The variance is necessary for the preservation and enjoyment of substantial property rights of the owner of the land.

(e) The variance will not be a substantial detriment to adjacent land and will not materially impair the purposes of these Rules.

Adverse economic conditions shall not be a valid reason to grant a variance.

A request for a variance shall be in writing and shall state specifically the reasons for the request and shall include all data and information in support of the request. The request shall be reviewed and approved, disapproved or approved with modifications within thirty – (30) working days. Failure to act within said time will result in the variance request being approved.

8. Appeals

Any person receiving a denial of permit may appeal the determination to the Board of Commissioners or its designee. The Notice of Appeal must be mailed to the Clerk of the Board of Commissioners within 14 days of the Notice of Denial. A hearing shall take place within 30 days of receipt of the Notice. Written notice of the hearing will be sent to the appellant.

9. Penalties

No person shall violate any rule adopted or order issued under this section. Notwithstanding Section 6.2 of this section, if the Board of County Commissioners determines that a violation of any rule adopted, or administrative order issued under this section exists, the Board may request, in writing, the prosecuting attorney of the county to seek an injunction or other appropriate relief in the Court of Common pleas to abate excessive erosion or sedimentation and secure compliance with the rules or order. In granting relief, the Court of Common Pleas may order the construction of sediment control improvements orimplementation of other control measures and may assess a civil fine or not less than one hundred ormore than five hundred dollars. Each day of violation or a rule adopted, or administrative order issued under this section shall be considered a separate violation subject to a civil fine.

10. Contractor Registration

Contractors planning to perform erosion and sediment control related construction activities must be registered with the Lorain County Storm Water Management District. To become registered the contractor must have on staff and in responsible charge of erosion and sediment control permit compliance a certified inspector. Lorain County Stormwater Management District will keep on file specific requirements and application forms which may be updated as needed for contractor registration.

In order to obtain an Erosion and Sediment Control permit the applicant must include the name and contact information of the registered contractor that will be performing the work.

Review and Inspection Fee Schedule

Please make all checks payable to: Lorain County Commissioners

Full Erosion & Sediment Control Plan Review- For Up To Three (3) Submittals

Subdivisions, Commercial, Industrial, Residential Subdivisions *	10 acres or less	$ 120.00
	More than 10 to and including 20 acres	$ 180.00
	More than 20 to and including 50 acres	$ 240.00
	More than 50 acres	$300.00
Non-Residential Individual Development Site	One acre to and including 5 acres	$ 120.00
	More than 5 to and including 10 acres	$ 180.00
	For each additional 5 acres, above fees apply plus	+$60.00
Multi Family Development Site (Apartments, Condominiums, Townhouses)	10 acres or less	$ 120.00
	More than 10 to and including 20 acres	$ 180.00
	More than 20 to and including 50 acres	$ 240.00
	More than 50 acres	$ 300.00
A Non-Residential lot within a Common Plan of Development	Any lot **one acre or greater** within a Common Plan of Development	$120.00
Multi-Family Development within a Common Plan of Development	Any lot **one acre or greater** within a Common Plan of Development	$120.00
General Non-Residential Grading and Clearing/ Grading for Recreational	10 acres or less	$ 30.00
	More than 10 up to and including 20 acres	$60.00
	More than 20 up to and including 50 acres	$90.00
	For all acreage over 50 acres	$120.00

* Fees will be assessed with each phase of development.

Abbreviated ESC Plan – see page 35

Review and Inspection Fees

Please make all checks payable to: Lorain County Commissioners

Erosion and Sediment Control Permit- Valid for 2 years. Includes up to 24 monthly Inspections

Subdivisions, Commercial, Industrial, Residential Subdivisions *	10 acres or less	$ 2,160.00
	More than 10 to and including 20 acres	$ 2,880.00
	More than 20 to and including 50 acres	$ 4,320.00
	More than 50 acres	$5,760.00
Non-Residential Individual Development Site	one acre to and including 5 acres	$ 1,440.00
	More than 5 up to and including 10 acres	$ 2,160.00
	For each additional 5 acres, above fees apply plus	+$1,000.00
Multi Family Development Site (Apartments, Condominiums, Townhouses)	10 acres or less	$ 500.00
	More than 10 to and including 20 acres	$ 800.00
	More than 20 to and including 50 acres	$ 1,100.00
	More than 50 acres	$ 1,400.00
A Non-Residential lot within a Common Plan of Development	Any lot **one acre or greater** within a Common Plan of Development	$360.00
Multi-Family Development within a Common Plan of Development	Any lot **one acre or greater** within a Common Plan of Development	$360.00
General Non-Residential Grading and Clearing/ Grading for Recreational	10 acres or less	$ 30.00
	More than 10 up to and including 20 acres	$60.00
	More than 20 up to and including 50 acres	$90.00
	For all acreage over 50 acres	$120.00

* Fees will be assessed with each phase of development.

Erosion and Sediment Control Permit- Valid for 2 years. Includes up to 24 monthly Inspections		
Individual Residential Projects	Any project one acre or greater	$360.00

Review and Inspection Fee Schedule

Please make all checks payable to: Lorain County Commissioners

Abbreviated ESC Plan		
Single Lot ESC Evaluation (Lot Splits)	Lots 10 acres or less Lots more than 10 acres	$20.00 $30.00
All New, Single-Family Residential Projects	Any project one acre or greater or part of a common Plan of development	$ 50.00
Any Residential Clearing	Any project one acre or greater	$ 30.00
Variance Fee		$ 150.00
Stop Work Order Inspections – Inspection to determine contractor is in compliance following a stop work order	10 acres or less More than 10 Acres	$ 100.00 $ 200.00
Stop Work Order Re-inspections	Initial Stop Work Order fee above plus $50 for each additional week of non-compliance	$50.00
Non-Compliance re-inspections (NOV 2)		$100.00

CITY OF OBERLIN, OHIO

ORDINANCE No. 19-62 AC CMS

AN ORDINANCE AMENDING CHAPTER 916 OF THE MUNICIPAL CODE OF THE CITY OF OBERLIN, OHIO, IN ORDER TO UPDATE STORMWATER RUNOFF MANAGEMENT STANDARDS AND STORMWATER EROSION AND SEDIMENT CONTROL STANDARDS FOR THE CITY OF OBERLIN STORMWATER SYSTEM AND DECLARING AN EMERGENCY

WHEREAS, the City of Oberlin owns, operates and maintains a municipal separate stormwater system for the collection and conveyance of storm and other surface and subsurface waters and for flood control in accordance with the requirements of the Ohio Environmental Protection Agency National Pollutant Discharge Elimination System; and

WHEREAS, the City of Oberlin must update its standards regulating the quantity of stormwater discharged and regulating stormwater contaminants necessary to protect water quality in accordance with the permit requirements of the Ohio Environmental Protection Agency National Pollutant Discharge Elimination System for municipal separate stormwater systems.

NOW, THEREFORE BE IT ORDAINED, by the Council of the City of Oberlin, County of Lorain, State of Ohio:

SECTION 1. That Chapter 916 – Municipal Stormwater Utility of the Codified Ordinances of the City of Oberlin, Ohio is hereby amended as set forth in Exhibit A attached hereto and incorporated herein by reference.

SECTION 2. It is hereby found and determined that all formal actions of this Council concerning or relating to the adoption of this ordinance were adopted in an open meeting of this Council, and that all deliberations of this Council and of any of its committees that resulted in such formal action, were in meetings open to the public in compliance with all legal requirements, including Section 121.22 of the Ohio Revised Code.

SECTION 3. That this Ordinance is hereby declared to be an emergency measure necessary for the immediate preservation of the public peace, health and safety of the citizens of the City of Oberlin, Ohio, or to provide for the usual daily operation of a municipal department, to wit: *to update the Codified Ordinances of the City of Oberlin to ensure compliance with the requirements of the City's National Pollutant Discharge Elimination System permit*; and provided that it is elevated to emergency status by the affirmative vote of at least five members of Council and receives the affirmative vote of at least five members of Council upon final passage, it shall go into full force and effect from and immediately after its passage; otherwise, it shall take effect at the earliest period allowed by law.

PASSED: 1st Reading: October 21, 2019

2nd Reading: November 4, 2019

3rd Reading: November 18, 2019 :/ Passed on Emergency

ATTEST:

Belinda B. Anderson

BELINDA B. ANDERSON, MMC
CLERK OF COUNCIL

Bryan T. Burgess

BRYAN BURGESS
PRESIDENT OF COUNCIL

POSTED: 11/19/2019

EFFECTIVE DATE: 11/18/2019

EXHIBIT A

Chapter 916
Municipal Storm Water Utility

916.01	DIVISION ESTABLISHED.
916.02	PURPOSE AND OBJECTIVE.
916.03	PERSONNEL.
916.04	POWERS AND DUTIES OF PUBLIC WORKS DIRECTOR.
916.05	DEFINITIONS.
916.06	FUNDING THE MUNICIPAL STORM WATER UTILITY DIVISION.
916.07	MUNICIPAL STORM WATER UTILITY DIVISION ENTERPRISE FUND.
916.08	MUNICIPAL STORM WATER UTILITY DIVISION RATE STRUCTURE AND FEES.
916.09	NECESSITY FOR SERVICE CHARGES.
916.10	RIGHT TO APPEAL.
916.11	COLLECTION AND PAYMENT OF SERVICE CHARGES.
916.12	ADJUSTMENTS TO STORM WATER SERVICE CHARGES.
916.20	STORMWATER RUNOFF MANAGEMENT STANDARDS.
916.21	STORMWATER MANAGEMENT PERMIT REQUIRED.
916.22	STORMWATER MANAGEMENT PLAN REVIEW.
916.23	PERMIT DURATION; RENEWAL.
916.24	CERTIFICATION OF COMPLETION.
916.25	MAINTENANCE OF STORMWATER MANAGEMENT FACILITIES AND IMPROVEMENTS.
916.30	STORMWATER EROSION AND SEDIMENT CONTROL STANDARDS.
916.31	STORMWATER POLLUTION PREVENTION PERMIT REQUIRED.
916.32	STORMWATER POLLUTION PREVENTION PLAN REVIEW.
916.33	PERMIT DURATION; RENEWAL.
916.34	CERTIFICATION OF COMPLETION.
916.80	INSPECTION FEES.
916.81	RIGHT OF ACCESS.
916.82	COMPLIANCE.
916.98	FALSIFIYING INFORMATION.
916.99	PENALTY

916.20 STORMWATER RUNOFF MANAGEMENT STANDARDS

(1) The City of Oberlin Stormwater Runoff Management Standards establish technically feasible and economically reasonable stormwater management standards to achieve a level of stormwater quality and quantity control that will minimize degradation of water resources and the potential for property damage.

(2) The City of Oberlin Stormwater Runoff Management Standards shall apply to any development equal to or greater than one (1) acre or to any size development if it is part of a larger contiguous common plan of development.

(3) Subject to the provisions set forth in this chapter, the City of Oberlin hereby adopts the City of Oberlin Stormwater Runoff Management Standards which are and shall be incorporated into the City of Oberlin Public Works Standards. The City of Oberlin Stormwater Runoff Management Standards shall meet or exceed the technical requirements set forth in the Ohio Environmental Protection Agency NPDES Construction General Permit and any subsequent Ohio Environmental Protection Agency issued permits.

(4) The City of Oberlin Stormwater Runoff Management Standards are hereby referenced and adopted as part of this chapter. The City Engineer is authorized to amend, supplement, or revise the City of Oberlin Stormwater Runoff Management Standards based on improvements in engineering, science, monitoring, local maintenance experience, and federal or state regulations.

(5) The City of Oberlin Stormwater Runoff Management Standards shall be available at the Office of the City Engineer.

916.21 STORMWATER MANAGEMENT PERMIT REQUIRED.

Any person performing any earth-disturbing activity that disturbs an area equal to or greater than one (1) acre shall be required to file a Stormwater Management Plan with and to obtain a Stormwater Management Permit from the City of Oberlin Public Works Department.

Permit application forms shall be made available from the Public Works Department. Information required shall be sufficient for the Department to determine that the Stormwater Management Plan is in compliance with the OEPA Construction General permit and the City of Oberlin Stormwater Management Runoff Standards. At a minimum, the Stormwater Management Plan shall include the following:

(1) Name, address and phone number of property owner, the Stormwater Management Plan designer and the person responsible for the activity.

(2) Location of the activity.

(3) Description of the activity.

- (A) Type of activity
- (B) Location, permanent parcel number(s)
- (C) The size of the parcel(s) on which the activity will occur
- (D) The size of the area to be disturbed
- (E) Current impervious area
- (F) Area to be rendered permanently impervious
- (G) Project duration including anticipated start and completion dates
- (H) Stormwater Management Run-off Calculations
- (I) Structural Best Management Practices to be implemented
- (J) Non-Structural Best Management Practices to be implemented

(4) The Public Works Department reserves the right to request such additional information as may be necessary to ensure the Stormwater Management Plan meets the requirements of the City's Stormwater Runoff Management Standards.
(5) No permit shall be required for earth-disturbing activities which have been provided for in a Stormwater Management Plan approved before the effective date of this Ordinance.
(6) No permit shall be required for farming activities regulated by, and in compliance with, the Ohio Agricultural Sediment Pollution Abatement Rules.

916.22 STORMWATER MANAGEMENT PLAN REVIEW.
All Stormwater Management Permit Applications, Plans and Run-off Calculations shall be submitted to the City of Oberlin Public Works Department. The Office of the City Engineer shall review the stormwater management plan and runoff calculations within thirty days of receipt and indicate its approval or disapproval. Notice of disapproval shall include the plan deficiencies. No earth-disturbing activities shall be permitted until an acceptable plan has been filed with and approved by the City Engineer.

The Stormwater Management Permit shall be issued by the City Engineer at such time as all of the requirements of the City's Stormwater Runoff Management Standards have been met by the Applicant's Stormwater Management Plan and (where applicable) upon Site Plan approval by the City Planning Commission.

916.23 PERMIT DURATION; RENEWAL
The Stormwater Management Permit shall be valid until 30 calendar days after the anticipated completion date identified by the permit holder in the application. Upon the permit holder's written request, the City Engineer is authorized to renew the Stormwater Management Permit for up to 180 days per renewal. At the sole discretion of the City Engineer, renewal permits may be subject to compliance with any and all regulatory changes that may have been adopted between the date of the initial permit and any subsequent renewal permit(s).

916.24 CERTIFICATION OF COMPLETION.
The permit holder shall submit to the Office of the City Engineer a copy of the as-built drawings for the stormwater management facilities and a signed, stamped statement by the Professional Engineer or Professional Surveyor, who prepared the Stormwater Management Plan and/or supervised the construction of the stormwater management facilities, indicating that said facilities have been constructed in accordance with the approved Stormwater Management Plan.

916.25 MAINTENANCE OF STORMWATER MANAGEMENT FACILITIES AND IMPROVEMENTS.
Stormwater management facilities and improvements constructed under the approved Stormwater Permit are the property owner's responsibility to inspect, operate, properly maintain, repair and replace. An Inspection and Maintenance Agreement for stormwater management facilities and improvements between the City and the applicant shall be recorded at the Lorain County Recorder's Office. Said Agreement shall include an Operation and Maintenance Plan developed and implemented in accordance with the City of Oberlin Stormwater Runoff Management Standards. Where stormwater management facilities and improvements are located on individual parcels and said facilities and improvements are the responsibility

of the parcel owner, the necessary provisions shall be written into the deeds for said parcels, to ensure their continuing function as stormwater management facilities and improvements.

916.30 STORMWATER EROSION AND SEDIMENT CONTROL STANDARDS.

(1) In order to minimize and/or eliminate the degradation of the waters of the State, the City of Oberlin adopts the Stormwater Erosion and Sediment Control Standards for construction and post-construction stormwater management established in the most recent edition of the Ohio Environmental Protection Agency Construction General Permit. .

(2) These Standards shall apply to any development equal to or greater than one (1) acre or to any size development if it is part of a larger contiguous common plan of development.

916.31 STORMWATER POLLUTION PREVENTION PERMIT REQUIRED

When a proposed development involves an area equal to or more than one acre of earth-disturbing activities, the owner shall develop and submit a Stormwater Pollution Prevention Plan to the Office of the City Engineer for review and approval.

For development involving less than one acre of earth-disturbing activities, which is part of a larger common plan of development that has or will disturb one or more acres of land, the owner shall develop and submit a Stormwater Pollution Prevention Plan to the Office of the City Engineer for review and approval.

Permit application forms shall be made available from the Public Works Department. Information required shall be sufficient for the Department to determine that the Stormwater Pollution Prevention Plan is in compliance with the requirements of the OEPA Construction General Permit. At a minimum, the Stormwater Pollution Prevention Plan shall include the following:

(1) Name, address and phone number of property owner, the Stormwater Pollution Prevention Plan designer and the person responsible for implementing the Plan during construction.

(2) Location of the activity

(3) Description of the activity

- (A) Type of activity
- (B) Location by address and by permanent parcel number(s)
- (C) The size of the parcel(s) on which the activity will occur and the size of the area to be disturbed
- (D) Project duration including anticipated start and completion dates
- (E) A site map, drawn to scale, including but not limited to:
  - a. Project boundaries
  - b. Grading Plan at 1' contour intervals with direction of flow arrows
  - c. Public and/or Private Stormwater Infrastructure on and adjacent to the site
- (F) Structural and Non-Structural Best Management Practices to be implemented during construction
- (G) Post-construction Structural and Non-Structural Best Management Practices
- (H) A copy of the Construction General Permit Notice of Intent submitted to the Ohio Environmental Protection Agency

(4) The Public Works Department reserves the right to request such additional information as may be necessary to ensure that the Stormwater Pollution Prevention Plan meets the requirements of the OEPA Construction General Permit.

(5) No permit shall be required for earth-disturbing activities which have been provided for in a Stormwater Pollution Prevention Plan approved before the effective date of this Ordinance.
(6) No permit shall be required for farming activities regulated by, and in compliance with, the Ohio Agricultural Sediment Pollution Abatement Rules.

916.32 STORMWATER POLLUTION PREVENTION PLAN REVIEW

No earth-disturbing activities shall be permitted until an acceptable plan has been filed with and approved by the City Engineer. All Stormwater Pollution Prevention Plan Permit Applications shall be submitted to the City of Oberlin Public Works Department. The Office of the City Engineer shall review the Stormwater Pollution Prevention Plan within thirty days of receipt and indicate its approval or disapproval. Notice of disapproval shall include the plan deficiencies.

When the Stormwater Management Plan Permit has been issued as provided for in Section 916.22 and all of the requirements of the OEPA Construction General Permit have been met by the Applicant's Stormwater Pollution Prevention Plan, the City Engineer shall issue the Stormwater Pollution Prevention Plan Permit.

916.33 PERMIT DURATION; RENEWAL

The Stormwater Pollution Prevention Plan Permit shall be valid until 30 calendar days after the anticipated completion date identified by the permit holder in the application. Upon the permit holder's written request, the City Engineer is authorized to renew the Stormwater Pollution Prevention Plan Permit for up to 180 days per renewal. At the sole discretion of the City Engineer, renewal permits may be subject to compliance with any and all regulatory changes adopted between the date of the initial permit and any subsequent renewal permit(s).

916.34 CERTIFICATION OF COMPLETION.

Upon completion of the development activity subject to a Stormwater Pollution Prevention Plan Permit, the Office of the City Engineer shall conduct a final inspection of the development site with the permit holder. The permit holder shall submit a signed statement to the Office of the City Engineer, indicating that the approved Plan has been fully implemented and that the development activities have been completed. The permit holder shall submit to the Office of the City Engineer, a copy of the Construction General Permit Notice of Termination sent to the Ohio Environmental Protection Agency.

916.80 INSPECTION FEES

(1) Prior to issuance of the Stormwater Pollution Prevention Plan Permit, the permit applicant shall pay a non-refundable, inspection fee to the Public Works Department to offset inspection costs to assure conformance with the Stormwater Management Permit and compliance with the Stormwater Pollution Prevention Plan. The fee shall be in the amount of fifty dollars ($50.00) for every 30-day period of project duration identified in the Stormwater Pollution Prevention Plan Permit Application.
(2) Renewal Permits shall be subject to an additional inspection fee of fifty dollars ($50.00) for every additional 30-day period of project duration.
(3) A re-inspection fee of $50.00 shall be due and payable for every such re-inspection after the second written notice described hereinbelow in Section 916.42 (3)c.

(4) The inspection fee is applicable during the development of phased residential development projects for the construction of the common improvements serving said development. The inspection fee does not subsequently apply to the development of each residential parcel subject to the Stormwater Management Plan and/or the Stormwater Pollution Prevention Plan.

No inspection fee shall be required for projects with a Stormwater Management Plan and/or a Stormwater Pollution Prevention Plan approved before the effective date of this Ordinance.

916.81 RIGHT OF ACCESS

The City of Oberlin shall be permitted to enter onto properties subject to Stormwater Management and/or Stormwater Pollution Prevention plans and under the terms of the Inspection and Maintenance Agreement per Section 916.25, in order to inspect said properties, facilities and improvements for compliance with the approved plan(s) and Agreement(s) as often as may be necessary.

Nothing in this section shall be deemed to authorize the City Engineer or his/her designee to enter any premises without the consent of the owner or person or entity having control of such premises except by lawful process.

916.82 COMPLIANCE.

(1) The Office of the City Engineer shall inspect all properties subject to Stormwater Management and/or Storm Water Pollution Prevention plans during construction to determine compliance with the approved plan(s).

(2) The Office of the City Engineer shall inspect all properties subject to post-construction Inspection and Maintenance Agreements to determine compliance with said Agreement(s).

(3) If it is determined that the responsible party is in noncompliance with the approved plan(s) or agreement(s), the responsible party shall be:

a. Given a verbal or written notice and a schedule for compliance to complete required remedial actions.

b. On or after the date by which the remedial action described in Section 916.42 (3)a, is to be completed, the premises shall be re-inspected. If the required remedial action is not complete, a written notice shall be served on the permit holder stating the cause of the violation, the remedial steps to be taken, the schedule for compliance and the subsequent consequences of continued non-compliance.

c. On or after the date by which the remedial action described in Section 916.42 (3)b, is to be completed, the premises shall be re-inspected. If the required remedial action is not complete, a second written notice shall be served on the permit holder stating the cause of the violation, the remedial steps to be taken, the schedule for compliance and the subsequent consequences of continued non-compliance.

d. On or after the date by which the remedial action described in the second written notice of violation is to be completed, the premises shall be re-inspected. If the required remedial action is not complete, the City Engineer is authorized to issue a Stop Work Order. The Stop Work Order shall be issued in writing with the reason for the order clearly stated and the condition(s) under which the cited work may resume. The Stop Work Order shall be given to the permit holder or its agent and to the person(s) doing the work. Upon issuance of the Stop Work Order, all work shall immediately cease, except such work as the permit holder is directed to perform to correct said violation or to

remove an unsafe condition. Failure to cease work after receipt of a Stop Work Order is hereby declared to be a public nuisance.

e. If, after fourteen (14) days following receipt of the Stop Work Order, the remedial action has not been completed, the matter of such noncompliance shall be reported to the City Law Director for legal action in accordance with the provisions of this Chapter.

f. If, after fourteen (14) days following receipt of the Stop Work Order, the remedial action has not been completed, the City may elect to complete the necessary remedial action with its own forces or by contract. The costs, thereof, shall be paid by the permit holder.

916.99 PENALTY.

Violation of the provisions of this chapter or failure to comply with any of its requirements shall constitute a minor misdemeanor. Whoever violates any provision of this chapter or fails to comply with any of its requirements shall be fined not more than One Hundred Fifty Dollars ($150.00) for each offense. Each day such violation continues shall be considered a separate offense. Nothing herein contained shall prevent the City from taking such other lawful action as is necessary to prevent or remedy any violation.

Exhibit 4 – Comprehensive Storm Water Management Regulations

RESOLUTION NO. 19-714

In the matter of approving updated Lorain County)
Comprehensive Storm Water Management Regulations) October 30, 2019
To maintain compliance with Ohio Environmental)
Protection Agency's current National Pollutant Discharge)
Elimination Permit and updating fees)

WHEREAS, The Lorain County Storm Water Management District and its co-permittees hold a National Pollutant Discharge Elimination Permit through the Ohio Environmental Protection Agency (OEPA) over time; and

WHEREAS, the Ohio Environmental Protection Agency amends and updates requirements of the National Pollutant Discharge Elimination Permit (NPDES); and

WHEREAS, permit holding communities are required to comply with these changes; and

WHEREAS, The Lorain County Storm Water Management District is requesting to update the Comprehensive Storm Water Management Regulations and permit fees to maintain compliance with the Ohio EPA's NPDES program; and

WHEREAS, the Lorain County Commissioners held 2 public hearing on October 15, 2019 and October 30, 2019; and

WHEREAS, Under Ohio Revised Code 307.79, the board of county Commissioners may adopt, amend, and rescind rules establishing technically feasible and economically reasonable standards to achieve a level of management and conservation practices that will abate wind or water erosion of the soil or abate the degradation of waters of the state.

NOW THEREFORE BE IT Resolved, based upon the above information, the Lorain County Board of Commissioners hereby approve updates to the Lorain County Comprehensive Storm Water Management Regulations and permit fees to maintain compliance with OEPA's NPDES program.

Motion by Lundy seconded by Kokoski to adopt Resolution. Upon roll call the vote taken thereon, resulted as: Ayes: Lundy, Kokoski, & Sweda / Nays: None
Motion carried. _____(discussion was held on the above)

I, Theresa L. Upton, Clerk to the Lorain County Board of Commissioners do hereby certify that the above Resolution No. 19-714 is a true copy as it appears in Journal No. 19 on date of October 30, 2019

Theresa L. Upton, Clerk

NPDES – PHASE II

LORAIN COUNTY
COMPREHENSIVE STORM WATER MANAGEMENT REGULATIONS

Effective – December 19, 2009
Updated – December, 2016
Updated – October 30, 2019

Administrator:

Lorain County Engineer
247 Hadaway Street
Elyria, Ohio 44035
Phone – 440-328-5585
Fax – 440-328-5587

www.loraincounty.com/engineer/

REFERENCES

The standards and specifications for Best Management Practices are contained within the

Rainwater and Land Development Manual, Ohio's
Standards, Current Edition
For
Storm Water Management, Land Development and Urban Stream Protection

Published in cooperation with:

Ohio Department of Natural Resources Division of Soil and Water Conservation
U.S.D.A. Natural Resource Conservation Service
Ohio Environmental Protection Agency

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CHAPTER 1
COMPREHENSIVE STORM WATER MANAGEMENT

1. PURPOSE AND SCOPE

A. The purpose of this regulation is to establish technically feasible and economically reasonable storm water management standards to achieve a level of storm water quality and quantity control that will minimize damage to property and degradation of water resources and will promote and maintain the health, safety, and welfare of the citizens of the Lorain County:

B. This regulation requires that a Comprehensive Storm Water Management Plan be developed and implemented before any non-agricultural soil disturbing activities for all development for which 10,000 sf or more of impervious area is added or for all soil disturbing activities disturbing one (1) acre or more of total land, or less than one acre if part of a larger common plan of development or sale disturbing one (1) or more acres of total land. The administrator may require a comprehensive stormwater management plan on any site with soil disturbing activities disturbing less than one (1) acre.

C. This regulation requires owners who develop or re-develop their property within Lorain County to:

1. Control storm water runoff from their property and ensure that all storm water management practices are properly designed, constructed, and maintained.

2. Reduce water quality impacts to receiving water resources that may be caused by new development or redevelopment activities.

3. Control the volume, rate, and quality of storm water runoff originating from their property so that surface water and ground water are protected and flooding and erosion potential are not increased.

4. Minimize the need to construct, repair, and replace subsurface storm drain systems.

5. Preserve natural infiltration and ground water recharge, and maintain subsurface flow that replenishes water resources, except in slippage prone soils.

6. Incorporate storm water quality and quantity controls into site planning and design at the earliest possible stage in the development process.

7. Reduce the expense of remedial projects needed to address problems caused by inadequate storm water management.

8. Maximize use of storm water management practices that serve multiple purposes including, but not limited to, flood control, erosion control, fire protection, water quality protection, recreation, and habitat preservation.

9. Design sites to minimize the number of stream crossings and the width of associated disturbance in order to minimize Lorain County's future expenses related to the maintenance and repair of stream crossings.

10. Maintain, promote, and re-establish conditions necessary for naturally occurring stream processes that assimilate pollutants, attenuate flood flows, and provide a healthy water resource.

D. This regulation shall apply to all parcels used or being developed, either wholly or partially, for new or relocated projects involving highways and roads; subdivisions or larger common plans of development; industrial, commercial, institutional, or residential projects; building activities on farms; redevelopment activities; grading; and all other uses that are not specifically exempted.

E. Public entities, including the State of Ohio, Lorain County, and the County shall comply with this regulation for roadway projects initiated after March 10, 2006 and, to the maximum extent practicable, for projects initiated before that time.

F. This regulation does not apply to activities regulated by, and in compliance with, the Ohio Agricultural Sediment Pollution Abatement Rules.

G. This regulation does not require a Comprehensive Storm Water Management Plan for linear construction projects, such as culverts, maintenance projects, ditch cleaning projects, pipeline or utility line installation, that do not result in the installation of impervious surface as determined by the Lorain County Engineer. Such projects shall be designed to minimize the number of stream crossings and the width of disturbance.Linear construction projects shall comply with the requirements of Erosion and Sediment Control Rules.

H. It is not the role of Lorain County to point out each and every part of these rules and how to implement them on the individual job sites. It is the project owner's responsibility to be proactive in meeting the intent, purpose and requirements of these rules.

2. DEFINITIONS

For the purpose of this regulation, the following terms shall have the meaning herein indicated:

A. ACRE: A measurement of land area equal to 43,560 square feet.

B. ADMINISTRATOR: Lorain County Engineer is named the administrator for these Regulations and is the entity having the responsibility and duty of administrating and ensuring compliance with these Rules.

C. AS-BUILT SURVEY: A survey shown on a plan or drawing prepared by a Registered Surveyor indicating the actual dimensions, elevations, and locations of any structures,

underground utilities, swales, detention and stormwater management facilities, and sewage treatment facilities after construction has been completed.

D. BEST MANAGEMENT PRACTICES (BMPs): Structural or nonstructural facilities or activities that control soil erosion and/or storm water runoff at a development site. Schedule of activities, prohibitions of practices, operation and maintenance procedures, treatment requirements, and other practices to reduce the pollution of water resources and to control storm water volume and rate.

E. BUFFER AREA: A designated transitional area around a stream or wetland left in a natural, usually vegetated, state to protect a stream or wetland from runoff pollution. Construction activates in this area shall be restricted or prohibited based on the sensitivity of the stream or wetland and the recommendation of the Administrator.

F. CHANNEL: A natural or manmade bed or ditch, existing or excavated for the conveyance of water.

G. CLEAN WATER ACT: The Federal Water Pollution Control Act enacted in 1972 by Public Law 92-500 and amended by the Water Quality Act of 1987. The Clean Water Act prohibits the discharge of pollutants to Waters of the United States unless said discharges is in accordance with an NPDES permit. The 1987 amendments include guidelines for regulatingmunicipal, industrial, and construction storm water discharges under the NPDES permit.

H. COMMON PLAN OF DEVELOPMENT: A term used to define the entire scope of a development project, both on-site and off-site, regardless of ownership, including phases (future and existing), sublots and parcels of development, associated easements, road and utility right of ways, and other land development or soil disturbances in support of the development project.

I. COMPREHENSIVE STORM WATER MANAGEMENT PLAN: The written document including plans and drawings that meet the requirements of this regulation and set forth the techniques, programs, strategies and practices to minimize storm water runoff from a development area, to safely convey or temporarily store and release post-development runoff at an allowable rate to minimize flooding and stream bank erosion, and to protect or improve storm water quality and stream channels.

J. CONSERVATION: The development of land using alternative layout and building arrangements in order to better conserve open space and retain natural resources.

K. COUNTY: Throughout these rules Lorain County shall mean the Lorain County Board of Commissioners, State of Ohio, and its designated agents and representatives. County shall mean unincorporated areas in Lorain County.

L. CRITICAL STORM: A storm that is calculated by means of the percentage increase in volume of runoff by a proposed development area. The critical storm is used to calculate the maximum allowable storm water discharge rate from a developed site.

M. CUT: An excavation that reduces an existing elevation, as in road or foundation constructions.

N. DETENTION FACILITY: A basin, pond, oversized pipe, or other structure that reduces the peak flow rate of storm water leaving the facility by temporarily storing a portion of the storm water entering the facility.

O. DEVELOPMENT AREA: A parcel or contiguous parcels owned by one person or persons, or operated as one development unit, and used or being developed for non-farm commercial, industrial, residential, institutional, or other construction or alteration that changes runoff characteristics of a parcel of land.

P. DEVELOPMENT DRAINAGE AREA: A combination of each hydraulically unique watershed with individual outlet points on the development area.

Q. DITCH: An open channel, either dug or natural, for the purpose of drainage or irrigation with intermittent flow.

R. DISTURBED AREA: An area of land subject to erosion due to the removal of vegetative cover and/or soil disturbing activities.

S. DRAINAGE: The removal of excess surface water or groundwater from land by surface or subsurface drains.

T. EARTH DISTURBING ACTIVITY: Any grading, excavations, filling, or other alteration of the earth's surface where natural or man-made ground cover is destroyed.

U. EROSION: The process by which the land surface is worn away by the action of wind, water, ice, gravity, or any combination of those forces.

V. EXISTING: In existence at the time of the passage of this ordinance and these regulations.

W. EXTENDED CONVEYANCE: A storm water management practice that replaces and/or enhances traditional open or closed storm drainage conduits by retarding flow, promoting percolation of runoff into the soil, and filtering pollutants during the storm water quality event.

X. EXTENDED DETENTION: A storm water management practice that replaces and/or enhances traditional detention facilities by releasing the runoff collected during the storm water quality event over at least 24 to 48 hours, retarding flow and allowing pollutants to settle within the facility.

Y. FARM: Land or water devoted to agricultural uses as defined in O.R.C. 519.01 including farming, ranching, aquaculture; horticulture; viticulture; animals; poultry husbandry and the production poultry products; dairy production; the productions of field crops, tobacco, fruits, vegetables, nursery stock, ornamental shrubs, ornamental trees, flowers, sod, or mushrooms; timber; pasturage, any combination of the foregoing; the processing, drying, storage, and marketing of agricultural products when those activities are conducted in conjunction with, but

are secondary to, such husbandry or production.

Z. FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA): The agency with overall responsibility for administering the National Flood Insurance Program.

AA. FINAL STABILIZATION: All soil-disturbing activities at the site have been completed and a uniform perennial vegetative cover with a density of at least 70% coverage for the area has been established or equivalent stabilization practices, such as the use of mulches or geotextiles, have been employed.

BB. FLOOD PLAIN: Any Special Flood Hazard Area (SFHA) identified by the Federal Emergency Management Agency (FEMA), including other areas that are susceptible to flooding as determined by the Lorain County Engineer.

CC. GRADING: The process in which the topography of the land is altered to a new elevation, grade or slope or any combination thereof, includes the land in its excavated or filled condition.

DD. GRUBBING: Removing, clearing or scalping material such as roots, stumps or sod.

EE. HYDROLOGIC UNIT CODE: a cataloging system developed by the United States Geological Survey and the Natural Resource Conservation Service to identify watersheds in the United States.

FF. IMPERVIOUS COVER: Any surface that cannot effectively absorb or infiltrate water. This may include roads, streets, parking lots, rooftops, sidewalks, and other areas not covered by vegetation.

GG. INFILTRATION: A storm water management practice that does not discharge to a water resource during the storm water quality event, requiring collected runoff to either infiltrate into the groundwater and/or be consumed by evapotranspiration, thereby retaining storm water pollutants in the facility.

HH. LARGER COMMON PLAN OF DEVELOPMENT OR SALE: A contiguous area where multiple separate and distinct construction activities may be taking place at different times on different schedules under one plan.

II. LANDSLIDE: A rapid mass movement of soil or rock moving downhill under the influence of gravity.

JJ. MS4: municipal separate storm water system which means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels or storm drains) that is:

1. Owned or operated by the federal government, state municipality, township,county, district or other public body (created by or pursuant to state or federal law) including special district under state law such as a sewer district, floodcontrol district or drainage districts, or similar entity, or a designated and approved management

agency under sections 208 of the Act (33 U.S.C., section 1288, effective February 4, 1987) that discharges into surface waters of the state;

2. Designated or used for collecting or conveying solely storm water;

3. Not combined sewer, and;

4. Not a part of a publicly owned treatment works.

KK. MS4 – SMALL: all municipal separate storm water systems that are neither a large MS4 nor a medium MS4.

LL. MS4 – MEDIUM: all municipal separate storm water systems that is located in an incorporated place with a population of one hundred thousand (100,000) or more, but less than two hundred fifty thousand (250,000) or more as determined by the 1990 censes by the United Stated Bureau of Censes. The 1990 census is available at public libraries and on the United Stated Bureau of the Censes web site: www.census.gov

MM. MS4 – LARGE: all municipal separate storm water systems that are located in an incorporated place with a population of two hundred fifty thousand (250,000) or more as determined by the 1990 censes by the United Stated Bureau of Censes. The 1990 census is available at public libraries and on the United Stated Bureau of the Censes web site: www.census.gov

NN. MAXIMUM EXTENT PRACTICABLE: The level of pollutant reduction that operators of small municipal separate storm sewer systems regulated under Section 40 C.F.R. Parts 9, 122, 123, and 124, referred to as NPDES Storm Water Phase II, shall meet.

OO. NPDES PERMIT: National Pollutant Discharge Elimination System. A regulatory program in the Federal Clean Water Act that prohibits the discharge of pollutants into surface waters of the United States without a permit.

PP. NATURAL RESOUCES CONSERVATION SERVICE (NRCS): An agency of the United States Department of Agriculture, formerly known as the Soil Conservation Service (SCS).

QQ. NONSTRUCTURAL STORM WATER MANAGEMENT PRACTICE: Storm water runoff control and treatment techniques that use natural practices, as defined by the Rainwater and Land Development Manual, to control runoff and/or reducepollution levels.

RR. OHIO EPA: The Ohio Environmental Protection Agency.

SS. OUTFALL: An area where water flows from a structure such as a conduit, storm sewer, improved channel or drain, and the area immediately beyond the structure which is impacted by the velocity of flow in the structure.

TT. PARCEL: Means a tract of land occupied or intended to be occupied by a use, building or group of buildings and their accessory uses and buildings as a unit, together with such open

spaces and driveways as are provided and required. A parcel may contain more than one contiguous lot individually identified by a 'Permanent Parcel Number' assigned by the Lorain County Auditor's Office.

UU. PERSON: An individual, corporation, firm, trust, commission, board, public or private partnership, joint venture, agency, unincorporated association, municipal corporation, county or state agency, federal government or any combination thereof.

UU. POST-DEVELOPMENT: The conditions that exist following the completion of soil disturbing activity in terms of topography, vegetation, land use, and the rate, volume, quality, or direction of storm water runoff.

VV. PRE-CONSTRUCTION MEETING: Meeting prior to construction between all parties associated with the construction of the project including government agencies, contractors and owners to review agency requirements and plans as approved and submitted.

WW. PRE-DEVELOPMENT: The conditions that exist prior to the initiation of soil disturbing activity in terms of topography, vegetation, land use, and the rate, volume, quality, or direction of storm water runoff.

XX. PROFESSIONAL ENGINEER: A Professional Engineer registered in the State of Ohio with specific education and experience in water resources engineering, acting in conformance with the Code of Ethics of the Ohio State Board of Registration for Engineers and Surveyors.

YY. RAINWATER AND LAND DEVELOPMENT MANUAL: Ohio's standards for storm water management, land development, and urban stream protection. Developed by the Ohio Department of Natural Resources, the U.S. Department of Agriculture Natural Resource Conservation Service, and the Ohio Environmental Protection Agency. The most current edition of these standards shall be used with these regulations.

ZZ. REDEVELOPMENT: A construction project on land where impervious cover has previously been developed and where the new land use will not increase the runoff coefficient. If the new land use will increase the runoff coefficient, then the project is considered a new development project rather than redevelopment project.

AAA. RIPARIAN AREA: Land adjacent to any watercourse such as a brook, creek, river, or stream having a defined bed and bank that, if appropriately sized, helps to stabilize streambanks, limit erosion, reduces flood size flows, and/or filters and settles out runoff pollutants, or performs other functions consistent with the purposes of this regulation.

BBB. RIPARIAN AND WETLAND SETBACK: The real property adjacent to a water resource on which soil disturbing activities are limited, all as defined by reference to Lorain County Erosion and Sediment Rules or locally adopted Riparian and Wetland Setbacks.

CCC. RUNOFF: The portion of rainfall, melted snow, or irrigation water that flows across the ground surface and is eventually returned to water resources.

DDD. SEDIMENT: The soils or other surface materials that can be transported or deposited by the action of wind, water, ice, or gravity as a product of erosion.

EEE. SEDIMENTATION: The deposition of sediment in water resources.

FFF. SEDIMENT BASIN: A temporary barrier or other suitable retention structure built across an area of water flow to intercept runoff and allow transported sediment to settle and be retained prior to discharge into waters of the State.

GGG. SEDIMENT CONTROL: The limiting of sediment being transported by controlling erosion or detaining sediment-laden water, allowing the sediment to settle out.

HHH. SEDIMENT POLLUTION: The degradation of water of the State by sediment as a result of failure to apply management or conservation practices to abate wind or water soil erosion, specifically in conjunction with soil-disturbing activities on land used or being developed for commercial, industrial, residential or other non-farm purposes.

III. SENSITVE AREA: An area or water resource that requires special management because of its susceptibility to sediment pollution or because of its importance to the well-being of the surrounding communities, region, or the state and includes, but is not limited to, the following:

1. Ponds, wetlands or small lakes with less than five (5) acres of surface area;

2. Small streams with gradients less than ten (10) feet per mile with averageannual flows of less than 3.5 feet per second containing sand or gravel bottoms;

3. Drainage areas of locally designated or an Ohio designated Scenic River;

4. Riparian and wetland areas.

JJJ. SETTLING POND: A runoff detention structure, such as a Sediment Basin or Sediment Trap, which detains sediment-laden runoff, allowing sediment to settle out.

KKK. SHEET FLOW: Water runoff in a thin uniform layer or rills and which is of small enough quantity to be treated by sediment barriers.

LLL. SITE OWNER/OPERATOR: Any individual, corporation, firm, trust, commission, board, public or private partnership, joint venture, agency, unincorporated association, municipal corporation, county or state agency, the federal government, other legal entity, or an agent thereof that is responsible for the overall construction site.

MMM. SLIP: A landslide as defined under "Landslides."

NNN. SOIL CONSERVATION: The use of the soil within the limits of its physical characteristics and protecting it from unalterable limitations of climate and topography.

OOO. SOIL DISTURBING ACTIVITY: Clearing, grading, excavating, filling, or other alteration of the earth's surface where natural or human made ground cover is destroyed and that may result in, or contribute to, increased storm water quantity and/or decreased storm water quality.

PPP. SOIL: Unconsolidated erodible earth material consisting of minerals and/or graphics.

QQQ. SOIL AND WATER CONSERVATION DISTRICT: An entity organized under Chapter 1515 of the Ohio Revised Code referring either to the Lorain Soil and Water Conservation District Board or its designated employee(s), hereinafter referred to as the Lorain County Soil & Water Conservation District.

RRR. SOIL LOSS: the soil moved from a given site by the forces of erosion, measured using " T ".

SSS. SOIL SURVEY: The official soil survey produced by the Natural Resources Conservation Service, USDA in cooperation with the Division of Soil and Water Conservation, ODNR and the local Board of County Commissioners; www.websoilsurvey.nrcs.usda.gov./app/

TTT. STRUCTURAL STORM WATER MANAGEMENT PRACTICE OR STORMWATER CONTROL MEASURE (SCM): Any constructed facility, structure, or device that prevents or reduces the discharge of pollutants to water resources and/or controls stormwater volume and flow rate.

UUU. STORM DRAIN: A conduit, pipe or human-made structure, which serves to transport storm water runoff.

VVV. STORM WATER POLLUTION PREVENTING PLAN (SWP3): The written document that sets forth the plans and practices to be used to meet the requirements of the NPDES permit.

WWW. STORM WATER RUNOFF: The direct response of a watershed to precipitation, which includes the surface and subsurface runoff that enters a stream, ditch, storm sewer or other concentrated flow during and following precipitation.

XXX. STABILIZATION: The use of Best Management Practices that reduce or prevent soil erosion by storm water runoff, trench dewatering, wind, ice, gravity, or a combination thereof.

YYY. STREAM: Shall have the same meaning as "water of the state" contained in O.R.C. 6111.01 and shall include all streams, lakes, ponds, marshes, watercourses, waterways, wells, springs irrigation systems, drainage systems, and other bodies or accumulations of water, surface and underground, natural or artificial, regardless of the depth of the strata in which underground water is located, that are situated wholly or partly within, or border upon, this state, or are within its jurisdiction, except those private waters that do not combine or effect a junction with natural surface or underground waters.

ZZZ. STRUCTURAL STORM WATER MANAGEMENT PRACTICE: Any constructed facility, structure, or device that provides storage, conveyance, and/or treatment of storm water runoff.

AAAA. SUBSOIL: That portion of the soil below the topsoil or plow layer, beginning 6 – 12" below surface down to bedrock parent material.

BBBB. SURFACE WATERS OF THE STATE: All streams, lakes, reservoirs, marshes, wetlands, or other waterways situated wholly or partly within the boundaries of the state, except those private waters which do not combine or affect a junction with surface water. Waters defined as sewerage systems, treatment works or disposal systems in Section 6111.01 of the Ohio Revised Code are not included.

CCCC. TOTAL MAXIMUM DAILY LOAD: The sum of the existing and/or projected point source, nonpoint source, and background loads for a pollutant to a specified watershed, water body, or water body segment. A TMDL sets and allocates the maximum amount of a pollutant that may be introduced into the water and still ensures attainment and maintenance of water quality standards.

DDDD. UNSTABLE SOILS: A portion of land surface or area which is prone to slipping, sloughing, landslides or is identified by Natural Resource Conservation Service, USDA methodology as having low soil strength.

EEEE. WATER QUALITY VOLUME: The volume of runoff from a contributing watershed that shall be captured and treated, equivalent to the maximized capture volume as defined in the American Society of Civil Engineers (ASCE) Manual and Report on Engineering Practice No. 87 and Water Environment Federation Manual of Practice No. 23 titled *Urban Runoff Quality Management*.

FFFF. WATER RESOURCE: Any public or private body of water; including wetlands; the area within the ordinary high water level of lakes and ponds; as well as the area within the ordinary high water level of any brook, creek, river, or stream having a defined bed and bank (either natural or artificial) which confines and conducts continuous or intermittent flow.

GGGG. WATER RESOURCE CROSSING: Any bridge, box, arch, culvert, truss, or other type of structure intended to convey people, animals, vehicles, or materials from one side of a watercourse to another. This does not include private, non-commercial footbridges or pole mounted aerial electric or telecommunication lines, nor does it include below grade utility lines.

HHHH. WATERCOURSE: Any natural, perennial, or intermittent channel, stream, river or brook.

IIII. WATERSHED: The total drainage area contributing storm water runoff to a single point.

JJJJ. WETLAND: Those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions, including swamps, marshes, bogs, and similar areas (40 CFR 232, as amended).

KKKK. WETLAND SETBACK: Those lands within the County that fall within the area defined by the criteria set forth in these regulations.

3. DISCLAIMER OF LIABILITY

A. Compliance with the provisions of this regulation shall not relieve any person from responsibility for damage to any person otherwise imposed by law. The provisions of this regulation are promulgated to promote the health, safety, and welfare of the public and are not designed for the benefit of any individual or any particular parcel of property.

B. By approving a Post Construction Comprehensive Storm Water Management Plan under this regulation, the County does not accept responsibility for the design, installation, and operation and maintenance of storm water management practices.

4. CONFLICTS, SEVERABILITY, NUISANCES & RESPONSIBILITY

A. Where this regulation is in conflict with other provisions of law or ordinance, the most restrictive provisions, as determined by the Administrator shall prevail.

B. If any clause, section, or provision of this regulation is declared invalid or unconstitutional by a court of competent jurisdiction, the validity of the remainder shall not be affected thereby.

C. These Rules shall not be construed as authorizing any person to maintain a nuisance on their property, and compliance with the provisions of this regulation shall not be a defense in any action to abate such a nuisance.

D. Failure of the County to observe or recognize hazardous or unsightly conditions or to recommend corrective measures shall not relieve the site owner from the responsibility for the condition or damage resulting therefrom, and shall not result in the County, its officers, employees, or agents being responsible for any condition or damage resulting therefrom.

5. DEVELOPMENT OF COMPREHENSIVE STORM WATER MANAGEMENT PLANS

A. This regulation requires that a "Post-Construction" Comprehensive Storm Water Management Plan be developed and implemented to meet these Rules and be coordinated and combined with any Riparian and Wetland Setback Plan and the Lorain County Erosion and Sediment Control Rules. Combination of these documents may constitute the Comprehensive Storm Water ManagementPlan. **The Plan shall be implemented for which 10,000 sf or more of impervious area is added or for all soil disturbing activities disturbing one (1) acre or more of total land, or less than one (1) acre if part of a larger common plan of development or sale disturbing one (1) or more acres of total land, and on which any regulated activity** of Lorain County Erosion and Sediment Control Rules – Section 1.3 and 3.1 is proposed. The Comprehensive Storm Water Management Plan so developed may serve as the Stormwater Pollution Prevention Plan required by Ohio EPA as part of the NPDES Storm Water Permit for General Construction.

B. The County shall administer this regulation, shall be responsible for determination of compliance with this regulation, and shall issue notices and orders as may be necessary. The

landowners / developers may consult with the Lorain County Soil & Water Conservation District, Lorain County Engineer's Office, private engineers, storm water districts, or other technical experts in reviewing the Comprehensive Storm Water Management Plan.

C. In addition to the requirements and design standards of this regulation the Comprehensive Storm Water Management Plan must meet the minimum requirements of the current Ohio EPA Construction General Permit and the design standards of the Ohio EPA Rainwater and Land Development Manual, current edition.

6. APPLICATION PROCEDURES

http://www.loarainswcd.com/forms/post-Constr-Plan-Application.pdf

A. Pre-Application Meeting: The applicant shall attend a Pre-Application Meeting with the Administrator and County Engineer to discuss the proposed project, review the requirements of this regulation, identify unique aspects of the project that shall be addressed during the review process, and establish a preliminary review and approval schedule.

B. Preliminary Comprehensive Storm Water Management Plan: The applicant shall submit two (2) sets of a Preliminary Comprehensive Storm Water Management Plan (Preliminary Plan) and the applicable fees to the Administrator. The Preliminary Plan shall show the proposed property boundaries, setbacks, topography extending at least 25 feet beyond site extents, dedicated open space, public roads, water resources, storm water control facilities, and easements in sufficient detail and engineering analysis to allow the Administrator to determine whether the site will meet the intent of this regulation and if the proposed storm water management practices will be capable of controlling runoff from the site in compliance with this regulation. The applicant shall submit two (2) sets of the Preliminary Plan and applicable fees as follows:

1. For subdivisions: In conjunction with the submission of the preliminary subdivision plan.

2. For other construction projects: In conjunction with the application for a zoning permit.

3. For general clearing projects: In conjunction with the application for a zoning permit.

1. Final Comprehensive Storm Water Management Plan: The applicant shall submit two (2) sets of a Final Comprehensive Storm Water Management Plan (Final Plan) and the applicable fees to the Administrator prior to any of the following: (1) Submittal of the final plat (for subdivisions) with applicable fees paid to Lorain County Commissioners; (2) Submittal of improvement plans with applicable fees to Lorain County Engineer's Office; (3) Submittal of an application for a building with applicable fees to a certified Building Department; (4) Submittal of a zoning permit for the site with applicable fees to that township. The Final Plan shall meet the requirements of Section 8 of these rules and shall be approved prior to approval of the final plat and/or before issuance by the township's zoning inspector or building permit by the Building Inspector.

C. Review and Comment: Lorain County Soil & Water Conservation District and Lorain County Engineer shall review the Preliminary and Final Plans submitted and shall approve or return for revisions with comments and recommendations for revisions. A Preliminary or Final Plan rejected because of deficiencies shall be returned with a narrative report stating specific inadequacies and the procedures for filing a revised Preliminary or Final Plan. The Administrator shall review the plan and approve or return for revision with comments and recommendations for revisions, within thirty (30) days working days after receipt of said plan. At the time of receipt of a revised plan, another thirty (30) working days review period shall be commenced.

D. Approval Necessary: Land clearing and soil-disturbing activities shall not begin and zoning and/or building permits shall not be issued without an approved Comprehensive Storm Water Management Plan.

E. Valid for Two Years: Approvals issued in accordance with this regulation shall remain valid for two (2) years from the date of approval.

F. One (1) Year Maintenance Bond: Shall be required for all improvements including "post-construction" measures. Lorain County Engineer may waive the requirement of the maintenance bond for small residential water quality SCMs within a larger common plan of sale that disturbs less than five (5) acres of land.

7. COMPLIANCE WITH STATE AND FEDERAL REGULATIONS

Approvals issued in accordance with this regulation do not relieve the applicant of responsibility for obtaining all other necessary permits and/or approvals from other federal, state, and/or county agencies. If requirements vary, the most restrictive shall prevail. These permits may include, but are not limited to, those listed below. Applicants are required to show proof of compliance with these regulations before the County will issue a storm water approval.

A. Ohio EPA NPDES Permits authorizing storm water discharges associated with construction activity. Proof of compliance with these requirements shall be the applicant's Notice of Intent (NOI) number from Ohio EPA, a copy of the Ohio EPA Director's Authorization Letter for the NPDES Permit, or a letter from the site owner certifying and explaining why the NPDES Permit is not applicable.

B. Section 401 of the Clean Water Act: Proof of compliance shall be a copy of the Ohio EPA Water Quality Certification application tracking number, public notice, project approval, or a letter from the site owner certifying that a qualified professional has surveyed the site and determined that Section 401 of the Clean Water Act is not applicable. Wetlands, and other waters of the United States, shall be delineated by protocols accepted by the U.S. Army Corps of Engineers at the time of application of this regulation.

C. Ohio EPA Isolated Wetland Permit: Proof of compliance shall be a copy of Ohio EPA's Isolated Wetland Permit application tracking number, public notice, project approval, or a letter from the site owner certifying that a qualified professional has surveyed the site and determined that Ohio EPA's Isolated Wetlands Permit is not applicable. Isolated wetlands shall be

delineated by protocols accepted by the U.S. Army Corps of Engineers at the time of application of this regulation.

D. Section 404 of the Clean Water Act: Proof of compliance shall be a copy of the U.S. Army Corps of Engineers Individual Permit application, public notice, or project approval, if an Individual Permit is required for the development project. If an Individual Permit is not required, the site owner shall submit proof of compliance with the U.S. Army Corps of Engineer's Nationwide Permit Program. This shall include one of the following:

1. A letter from the site owner certifying that a qualified professional has surveyed the site and determined that Section 404 of the Clean Water Act is not applicable.

2. A site plan showing that any proposed fill of waters of the United States conforms to the general and special conditions specified in the applicable Nationwide Permit. Wetlands, and other waters of the United States, shall be delineated by protocols accepted by the U.S. Army Corps of Engineers at the time of application of this regulation.

E. Ohio Dam Safety Law: Proof of compliance shall be a copy of the ODNR Division of Water permit application tracking number, a copy of the project approval letter from the ODNR Division of Water, or a letter from the site owner certifying and explaining why the Ohio Dam Safety Law is not applicable.

F. Flood Plain Permit(s): Proof of compliance shall be a copy of the U.S. Army Corps of Engineer's Conditional Letter of Map Revisions and/or a local flood plain permit. If no work is proposed in the flood plain, the applicant shall submit proof in the form of a letter from the site owner certifying that a qualified professional has surveyed the site and determined that no fill will be placed in the flood plain.

8. COMPREHENSIVE STORM WATER MANAGEMENT PLAN

A. Comprehensive Storm Water Management Plan Required: The applicant shall develop a "Post-Construction" Storm Water Management Plan describing how the quantity and quality of storm water for every discharge will be managed after construction is complete from the site, no "bypass" allowed. The plan will illustrate the type, location, and dimensions of every structural and non-structural storm water management practice incorporated into the site design, and the rationale for their selection. The rationale shall address how these storm water management practices will address flooding within the site as well as flooding that may be caused by the development upstream and downstream of the site. The rationale will also describe how the storm water management practices minimize impacts to the physical, chemical, and biological characteristics of on-site and downstream water resources and, if necessary, correct current degradation of water resources that is occurring or take measures to prevent predictable degradation of water resources.

B. Preparation by Professional Engineer: The Comprehensive Storm Water Management Plan shall be prepared by a registered professional engineer and include supporting calculations,

plan sheets, and design details. To the extent necessary, as determined by the Lorain County Engineer's office, a site survey shall be performed by a Registered Professional Surveyor to establish boundary lines, measurements, or land surfaces.

C. Community Procedures: The Lorain County Engineer's office shall prepare and maintain procedures providing specific criteria and guidance to be followed when developing the Comprehensive Storm Water Management Plan. These procedures may be updated from time to time, at the discretion of the Lorain County Engineer's office based on improvements in engineering, science, monitoring, and local maintenance experience. The Lorain County Engineer's office will make the final determination of whether the practices proposed in the Comprehensive Storm Water Management Plan meet the requirements of this regulation. The Lorain County Engineer's office may also maintain a list of acceptable Best Management Practices to be used in Lorain County, that meet the criteria of this regulation.

D. Contents of the Comprehensive Storm Water Management Plan: The Preliminary Comprehensive Storm Water Management Plan shall contain an application, narrative report, construction site plansheets, a long-term Inspection and Maintenance Agreement, and a site description with thefollowing information provided:

1. Site description:

   a. A description of the nature and type of the construction activity (e.g. residential, shopping mall, highway, etc.).

   b. Total area of the site and the area of the site that is expected to be disturbed (i.e. grubbing, clearing, excavation, filling or grading, including off-site borrow areas).

   c. A description of prior land uses at the site.

   d. An estimate of the impervious area and percent of imperviousness created by the soil-disturbing activity at the beginning and at the conclusion of the project.

   e. Existing data describing the soils throughout the site, including the soil series and association, hydrologic soil group, porosity, infiltration characteristics, depth to groundwater, depth to bedrock, and any impermeable layers.

   f. If available, the quality of any known pollutant discharge from the site such as that which may result from previous contamination caused by prior land uses.

   g. The location and name of the immediate water resource(s) and the first subsequent water resource(s).

   h. The plan (aerial view) extent and description of water resources at or near the site that will be disturbed or will receive discharges from the project.

   i. Describe the current condition of water resources including the vertical stability

of stream channels and indications of channel incision that may be responsible for current or future sources of high sediment loading or loss of channel stability.

Site map showing:

j. Limits of soil-disturbing activity on the site.

k. Soils types for the entire site, including locations of unstable or highly erodible soils.

l. Existing and proposed one-foot elevation (1') contours. This shall include a delineation of drainage watersheds expected before, during, and after major grading activities as well as the size of each drainage watershed in acres.

m. Water resource locations including springs, wetlands, streams, lakes, water wells, and associated setbacks on or within two-hundred (200) feet of the site, including the boundaries of wetlands or streams and first subsequent named receiving water(s). Include wetlands to be preserved and protected.

n. Existing and planned locations of buildings, roads, parking facilities, and utilities.

o. The location of any in-stream activities including stream crossings.

2. Contact information: Company name and contact information as well as contact name, addresses, email address(es), and phone numbers for the following:

   a. The Professional Engineer who prepared the Comprehensive Storm Water Management Plan.

   b. The Owner(s) of the Development Area.

   c. The Applicant.

   d. The Developer.

3. Phase, if applicable, of the overall development plan.

4. List of sub-lot numbers if project is a subdivision.

5. Ohio EPA NPDES Permit Number and other applicable state and federal permit numbers, if available or status of various permitting requirements if final approvals have not been received.

6. Location, including complete site address and sub-lot number if applicable.

7. Location of any easements or other restrictions placed on the use of the property.

8. A site plan sheet showing:

   a. The location of each proposed post construction storm water management practice and its point of discharge from the site. The size of the total drainage area contributing to the practice shall be indicated with either:
   a. the percent imperviousness; or *b.* post-Construction land use breakdown in acres shown.

   b. The geographic coordinates of the site AND each proposed practice in North American Datum Ohio State Plan North longitude and latitude.

   It is preferred that the entire site be shown on one plan sheet to allow a complete view of the site during plan review. If a smaller scale is used to accomplish this, separate sheets providing an enlarged view of areas on individual sheets should also be provided.

9. An Inspection and Maintenance Agreement. The Inspection and Maintenance Agreement required for storm water management practices under this regulation shall be a separate agreement between Lorain County and the owner, and shall contain the following information and provisions (The standard Inspection and Maintenance Agreement is provided in Appendix A):

   a. The location of each storm water control measure (SCM), including those practices permitted to be located in, or within fifty (50) feet of, water resources, and identification of the drainage area served by each storm water management practice.

   b. A schedule for regular maintenance for each aspect of the storm water management system and description of routine and non-routine maintenance tasks to ensure continued performance of the system as is detailed in the approved Post-Construction Storm Water Management Plan. This schedule may include additional standards, as required by the Lorain County Engineer, to ensure continued performance of storm water management practices permitted to be located in, or within fifty (50) feet of, water resources.

   c. The location and documentation of all access and maintenance easements to serve the property.

   d. Identification of the current and proposed landowner(s), organization, or municipality responsible for long-term maintenance, including repairs, of the storm water management practices.

   e. The landowner(s), organization, or municipality who shall maintain storm water management practices in accordance with this regulation.

f. Lorain County has the authority to enter upon the property to conduct inspections as necessary to verify that the storm water management practices are being maintained and operated in accordance with this regulation.

g. Lorain County shall maintain public records of the results of its site inspections, shall inform the landowner(s), organization, or municipality responsible formaintenance of the inspection results, and shall specifically indicate any corrective actions required to bring the storm water practices into proper working condition.

h. If Lorain County notifies the landowner(s), organization, or municipality responsible for maintenance of the maintenance problems that require correction, the specific corrective actions shall be taken within a reasonable time frame as determined by Lorain County.

i. Lorain County is authorized to enter upon the property and to perform the corrective actions identified in the inspection report if the landowner(s), organization, or municipality responsible for maintenance does not make the required corrections in the specified time period. Lorain County shall be reimbursed by the landowner(s), organization, or municipality responsible for maintenance for all expenses incurred within 10 days of receipt of invoice from Lorain County.

j. The proposed method of funding long-term maintenance and inspections of all storm water management practices.

k. A release of Lorain County from all damages, accidents, casualties, occurrences, or claims that might arise or be asserted against Lorain County from the construction, presence, existence, or maintenance of the storm water management practices.

Alteration or termination of these stipulations is prohibited. The applicant shall provide a draft of this Inspection and Maintenance Agreement as part of the Comprehensive Storm Water Management Plan submittal. A recorded copy of the final Agreement shall be submitted to Lorain County to receive final inspection approval of the site.

10. Calculations required: The applicant shall submit calculations for projected storm water runoff flows, volumes, and timing into and through all SCMs for flood control, channel protection, water quality, and the condition of the habitat, stability, and condition of each water resource and its flood plain, as required in Section 9 of this regulation. These submittals shall be completed for both pre- and post-development land use conditions and shall include the underlying assumptions and hydrologic and hydraulic methods and parameters used for these calculations. The applicant shall also include critical storm determination and demonstrate that the runoff from offsite and upper watershed areas have been considered in the calculations.

11. List of all contractors and subcontractors before construction: Prior to construction and before the pre-construction meeting, provide the list of all contractors and subcontractors names, addresses, and phones involved with the implementation of the Post Construction Storm Water Management Plan including a written document containing signatures of all parties as proof of acknowledgment that they have reviewed and understand the requirements and responsibilities of the Post Construction Storm Water Management Plan.

12. Existing and proposed drainage patterns: The location and description of existing and proposed drainage patterns and storm water management practices, including any related storm water management practices beyond the development area including the larger common development area.

13. For each storm water management practice to be employed, include the following:

    a. Location and size, including detail drawings, maintenance requirements during and after construction, and design calculations, all where applicable.

    b. Final site conditions including storm water inlets and permanent nonstructural and structural storm water management practices. Details of storm water management practices shall be drawn to scale and shall show volumes and sizes of contributing drainage areas.

    c. Any other structural and/or non-structural storm water management practices necessary to meet the design criteria in this regulation and any supplemental information requested by the Lorain County Engineer.

    d. 25' wide clear access to SCMs with minimum 15 feet wide level graded base and 12 feet wide gravel, asphalt or concrete driveway as determined by the Lorain County Engineer.

9. DESIGN PERFORMANCE STANDARDS

A. General: The storm water system, including storm water management practices for storage, treatment and control, and conveyance facilities, shall be designed to prevent structure flooding during the NRCS one-hundred (100)-year, twenty-four (24)-hour storm event; to maintain predevelopment runoff patterns and flows, and to meet the following criteria:

1. Integrated practices that address degradation of water resources. The storm water management practices shall function as an integrated system that controls flooding and minimizes the degradation of the physical, biological, and chemical integrity of the water resources receiving storm water discharges from the site. Acceptable practices shall:

    a. Not disturb riparian areas, unless the disturbance is intended to support a watercourse restoration project and complies with Lorain County Erosion and Sediment Control Rules – Section 4.4-F-2 and or the locally adopted Riparian

and Wetland Setbacks.

b. Minimize impacts to predevelopment hydrology and groundwater recharge on as much ofthe site as practical.

c. Only install new impervious surfaces and compact soils where necessary to support the future land use.

d. Compensate for increased runoff volumes caused by new impervious surfaces development and soil compaction by reducing storm water peak flows to equal or less than predevelopment levels, and by capturing all runoff from said practices. Storm water management practices that meet these criteria in this regulation, and additional criteria required by the Lorain County Engineer, shall comply with this regulation.

2. Practices designed for final use: Storm water management practices shall be designed to achieve the storm water management objectives of this regulation, to be compatible with the proposed development and post-construction use of the development area, to protect the public health, safety, welfare, and to function safely with minimal maintenance.

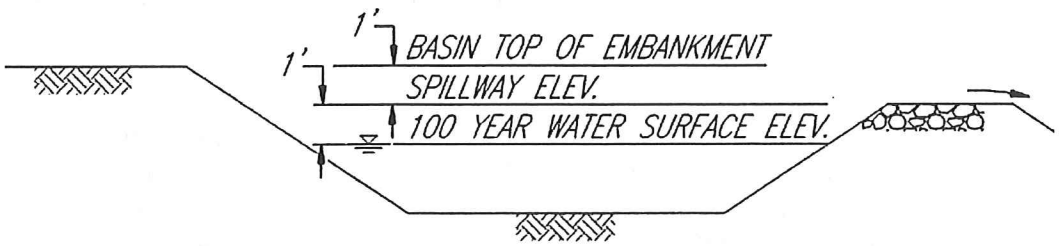
3. Adequate Outfall: Convey runoff from the development area to an adequate outfall, as recommended by the applicant's Professional Engineer, and approved by the Lorain County Engineer. Submit an engineering report at the preliminary plan stage that addresses the adequate outfall issue. Convey runoff to any adequate outfall that lies beyond the development area in accordance with these Comprehensive Storm Water Management Regulations. In this case, the applicant shall obtain easements for construction and maintenance and shall provide off-site improvements as recommended by his or her Professional Engineer and approved by the Lorain County Engineer.

4. Storm water management for entire development area: Areas developed for a subdivision, shall provide storm water management and water quality controls for the entire development area. This shall include provisions for lot grading and drainage that prevent structure flooding during the 100-year, 24-hour storm; and maintain, to the extent practicable, the pre-development runoff patterns, and peak flows from the development area.

5. Storm water facilities in water resources: Storm water management practices and related activities shall not be constructed in water resources unless the applicant shows proof of compliance with all appropriate permits from the Ohio EPA, the U.S. Army Corps, and other applicable federal, state, and local agencies as required in Section 7 of this regulation, and the activity is in compliance with Chapter 3 – Regulated Activities of the Lorain County Erosion and Sediment Control Rules and /or the locally adopted Riparian and Wetland Setbacks all as determined by the Lorain County Engineer.

6. Storm water management basins and surface conveyance channels: All storm water basin and surface conveyance designs shall provide a minimum of one foot of freeboard from

the peak water surface elevation within the facility during the one-hundred (100)-year, 24-hour storm, to the auxiliary "emergency spillway". The top of basin embankment shall be a minimum of one foot above the emergency spillway elevation. Design overflow structures for the condition when all other outlets are obstructed, and the facility has reached 100-year design storage capacity. When designing storm water management basins and conveyance channels, the applicant shall consider public safety as a design factor and alternative designs shall be implemented where site limitations would preclude a safe design. Storm Water Management Basins shall also conform to NRCS Conservation Practice Standard 378 "Pond" or to Ohio Dam Safety Law as applicable.



7. Exemption: The site where soil-disturbing activities are conducted shall be exempt from the requirements of Section 9 of this regulation if it can be shown to the satisfaction of the Lorain County Engineer that the site is part of a larger common plan of development where the storm water management requirements for the site are provided by an existing storm water management practice, or if the storm water management requirements for the site are provided by practices defined in a regional or local storm water management plan approved by the Lorain County Engineer.

8. Maintenance: All storm water management practices shall be maintained in accordance with Inspection and Maintenance Agreements approved by the Lorain County Engineer.

9. Ownership: Unless otherwise required by Lorain County, storm water management practices serving multiple lots in subdivisions shall be located on a separate lot or block of land with at least a 25' wide access corridor as part of the block, held and maintained by an entity of common ownership or, if compensated by the property owners, by Lorain County. Storm water conveyance practices serving multiple lots in a subdivision may be located in the rear of the lots accessed and restricted within easements, and maintained by an entity of common ownership or, if compensated by the property owners, by Lorain County. Storm water management practices serving single lots shall be placed on those lots, or blocks protected within easements, and maintained by the property owner.

10. Preservation of Existing Natural Drainage. Practices that preserve and/or improve the existing natural drainage shall be used to the maximum extent practicable. Such practices may include minimizing site grading and compaction; protecting and/or restoring water resources, riparian areas, and existing vegetation; and maintaining un-concentrated storm water runoff to and through these areas.

11. Preservation of Wetland Hydrology: Concentrated storm water runoff from BMPs to

wetlands shall be converted to diffuse flow before the runoff enters a wetland in order to protect the natural hydrology, hydro-period, and wetland flora. The flow shall be released such that no erosion occurs down slope. Practices such as level spreaders, vegetative buffers, infiltration basins, conservation of forest covers, and the preservation of intermittent streams, depressions, and drainage corridors may be used to maintain the wetland hydrology.

If the applicant proposes to discharge to natural wetlands, a hydrological analysis may be required to demonstrate that the proposed discharge matches the pre-development hydro-periods and hydrodynamics.

B. Storm Water Conveyance Design Criteria: All storm water management practices shall be designed to convey storm water safely, and to allow for the maximum removal of pollutants and reduction in flow velocities. This shall include but not be limited to:

1. Stream relocation or enclosure: The Lorain County Engineer may allow the enclosure or relocation of water resources only if the applicant shows proof of compliance with all appropriate permits from the Ohio EPA, the U.S. Army Corps, and other applicable federal, state, and local agencies as required in Section 7 of this regulation, and the activity is in compliance with Section 3 – Regulated Activities of the Lorain County Erosion and Sediment Control Rules and / or locally adopted Riparian and Wetland Setbacks all as determined by the Lorain County Engineer. At a minimum, stream relocation designs shall show how the project will minimize changes to the vertical stability, flood plain form, channel form, and habitat of upstream and downstream channels on and off the property.

2. Storm water discharges from off-site storm water runoff that discharges to or across the applicant's development site shall be conveyed through the storm water conveyance system at its pre-development peak flow rates during each design storm. Off-site flows shall be diverted around storm water quality control facilities or, if this is not possible, the storm water quality control facility shall be sized to treat the off-site flow. Comprehensive Storm Water Management Plans will not be approved until it is demonstrated to the satisfaction of the Lorain County Engineer that off-site runoff will be safely conveyed through the development site to an adequate outfall in a manner that does not exacerbate upstream or downstream flooding and erosion.

3. Runoff and Sheet Flow
Retard runoff velocity, reduce erosion, promote infiltration into the soil, and improve water quality by avoiding the direct connection of impervious areas (also termed "disconnecting") through the use of: splash blocks, sheet flow, overland flow, grass filters, vegetated buffer strips, grassed swales, open channel flow, and pervious pavement all in accordance with OEPA recommendations and as determined by the Lorain County Engineer. For design calculations, the length of post-development sheet flow shall not exceed 100 feet.

4. Open channels: Unless otherwise approved by the Lorain County Engineer, drainage tributary to SCMs may be provided by an open channel with vegetated banks, designed

to carry the ten (10)-year, storm water runoff.

5. Open drainage systems: Open drainage systems are preferred on all new development sites to convey storm water where feasible. Storm sewer systems shall be allowed only when the site cannot be developed at densities allowed under township's zoning or where the use of an open drainage system affects public health or safety, all as determined by the Lorain County Engineer. The following criteria shall be used to design storm sewer and open channel systems:

   a. Design storm sewers and open channels by the Rational Method (Q=CiA) for tributary areas less than two hundred acres. Calculate flow capacity in accordance with Manning's Formula ($V=1.486/n\ R^{2/3}\ S^{1/2}$). Use n=0.015 for pipes less than thirty inches in diameter.

      Storm sewers and open channels that drain tributary areas in excess of two hundred acres may be designed using flows calculated by Soil Service Technical Release No. 20 (TR-20).

      Design storm sewers and open channels with minimum mean velocity when flowing full of two feet per second, and with maximum mean velocity of ten feet per second in sewers, or five feet per second in open channels.

      Design Culverts in accordance with ODOT 1100.

      Design residential, commercial and industrial storm sewers and open channels as non-pressure conduits (to flow "just full") for the ten-year storm, with their twenty-five-year hydraulic grade line below the gutter line of the overlying roadway, or below the top of drainage structures outside the roadway. Also design open channels with a minimum of one foot freeboard to the top of their banks. The system shall be designed to meet these requirements when conveying the flows from the contributing areas within the proposed development and existing flows from offsite areas that are upstream from the development.

   b. Design public open channels with minimum slope of 0.3%, minimum bottom width of two feet, and maximum side slopes of 3:1. Specify vegetative cover and appropriate turf reinforcement.

   c. The minimum inside diameter of pipe permitted to be used in public storm sewer systems shall be twelve (12) inches (with minimum slope of 0.2%). Smaller pipe sizes may be used in private systems, subject to the approval of the Lorain County Engineer. Match crown elevations for public and private sewers.

   d. All storm sewer and open channel systems shall be designed taking into consideration the tailwater of the receiving facility or water resource. The tailwater elevation used shall be based on the design storm frequency. The hydraulic grade line for the storm sewer system shall be computed with consideration for the energy losses associated with entrance into and exit from

the system, friction through the system, and turbulence in the individual manholes, catch basins, and junctionswithin the system.

e. The inverts of all curb inlets, manholes, yard inlets, and other structures shall be formed and channelized to minimize the incidence of quiescent standing water where mosquitoes may breed.

f. Headwalls shall be required at all storm sewer inlets or outlets.

g. Submit profile and cross section drawings for all storm water management practices.

6. Water Resource Crossings. The following criteria shall be used to design structures that cross a water resource in the Lorain County:

a. Water resource crossings other than bridges shall be designed to convey the stream's flow for the minimum twenty-five (25)-year, twenty-four (24)-hour storm.

b. The design and construction of bridges or any other special drainage structures shall be reviewed and approved by the County Engineer. Bridges, open bottom arch or spans (3 or 4-sided culverts) are the preferred crossing technique and shall be considered in the planning phase of the development.

Bridges and open bottom spans should be considered for all State Scenic Rivers, coldwater habitat, exceptional warm water habitat, seasonal salmonid habitat streams, and Class III headwater streams. The footers or piers for these bridges and open spans should not be constructed within the ordinary high water mark.

c. If a culvert or other closed bottom crossing is used, twenty-five (25) percent of the cross-sectional area or a minimum of one (1) foot of box culverts and pipe arches shall be embedded below the channel bed.

d. The minimum inside diameter of pipes to be used for crossings shall be twelve (12) inches.

e. The maximum slope allowable shall be a slope that produces a maximum ten (10)-feet per second velocity within the culvert barrel under design flow conditions. Erosion protection and/or energy dissipaters shall be required to properly control entrance and outlet velocities.

f. All culvert installations shall be designed with consideration for the tailwater of the receiving facility or water resource. The tailwater elevation used shall be based on the design storm frequency.

g. Streams with a drainage area of 5 square miles or larger shall incorporate

flood plain culverts at the bank-full elevation to restrict head loss differences across the crossing so as to cause no rise in the 100-year storm event.

h. Bridges shall be designed such that the hydraulic profile through a bridge shall be below the bottom chord of the bridge for either the 100-year, twenty-four (24)-hour storm, or the 100-year flood elevation as determined by FEMA, whichever is more restrictive.

7. Overland flooding: Safely route overland flooding from the 100-year, twenty-four (24)-hour storm event to an adequate receiving water resource or storm water management practice such that the runoff is contained within the drainage easement for the flood routing path and does not cause flooding of buildings or related structures. The peak 100-year water surface elevation along flood routing paths shall be at least one foot below the finished grade elevation at all structures and roads. When designing the flood routing paths, the conveyance capacity of the site's storm sewers shall be taken into consideration. Provide drainage easements for all overland flood routing paths.

8. Compensatory flood storage mitigation: The Lorain County Engineer recommends that no fill be proposed in any flood plain. In order to preserve flood plain storage volumes and thereby avoid increases in water surface elevations, any filling within flood plains approved by the Lorain County Engineer shall be compensated by removing an equivalent volume of material therein. First consideration for the location(s) of compensatory flood plain volumes should be given to areas where the stream channel will have immediate access to the new flood plain within the limits of the development site. Consider enlarging existing or proposed storm water management facilities to compensate for flood plain fill if justified by a hydraulic analysis of the contributing watershed. Unless otherwise permitted by the Lorain County Engineer, reductions in volume due to flood plain fills shall be mitigated within the legal boundaries of the development. Embankment slopes used in compensatory storage areas shall reasonably conform to the natural slopes adjacent to the disturbed area. The use of vertical retaining structures is specifically prohibited.

9. Velocity dissipation: Velocity dissipation devices shall be placed at discharge locations and along the length of outfalls to provide non-erosive flow velocity from the structure to a water resource, so that the natural physical and biological characteristicsand functions of the water resource are maintained and protected.

C. **Storm Water Quality & Volume Control:**

1. Direct runoff to a BMP: Design the site to direct all runoff to one or more of the following SCMs.

a. For sites that disturb less than two (2) acres, the Administrator may approve other SCM's if the applicant demonstrates to the Lorain County Engineer's satisfaction that these SCM's meet the objectives of the regulation as stated in Section 9.C.6.

b. For sites that disturb two (2) acres or more of land, the Administrator and/or the Lorain County Engineer may approve other SCM's if the applicant demonstrates to the Administrator and/or the Lorain County Engineer's satisfaction that these SCM's meet the objectives of this regulation as stated in Section 9.C.6, and has prior written approval from the Ohio EPA.

c. For the construction of new roads, roadways and improvement projects by public entities (i.e. the state, counties, townships, cities, or villages), the Lorain County Engineer may approve alternative SCMs in accordance, with the current version of the Ohio Departments of Transportations "*Location and Design Manual, Volume Two Drainage Design*".

2. Criteria applying to all storm water management practices. Practices chosen shall be sized to treat the water quality volume (WQv) and to ensure compliance with OhioWater Quality Standards (OAC Chapter 3745—1).

a. WQv is determined by the methodology provided in the current edition of the Ohio EPA Construction General Permit.

b. Post-construction practices shall be sized to treat 100% of the WQv associated with their contributing drainage area. If there is an existing post-construction BMP that treats runoff from the disturbed area, and the BMP design (i.e. extended detention volume and outlet) allow the BMP to meet the post-construction requirements of this regulation, no additional post-construction BMP will be required. Design information for such facilities such as contributing drainage areas, capacities, elevations, outlet details and drain times shall be included in the plan.

c. Only Post-construction BMPs that are allowed by the current edition of the Ohio EPA Construction General Permit are permitted by this regulation. All Post-construction BMPs shall be designed in accordance with the current edition of the Ohio EPA Construction General Permit and the *Rainwater and Land Development Manual.*

d. Post-construction BMPs shall be designed such that the drain time is long enough to provide treatment and protect against downstream bank erosion, but short enough to provide storage for successive rainfall events.

e. Each practice shall be designed to facilitate sediment removal, vegetation management, debris control, and other maintenance activities defined in the Inspection Plan and Maintenance Agreement for the site.

3. Additional criteria applying to infiltration facilities (including Bio-Retention).

a. Infiltration facilities shall only be allowed if the soils of the facility fall within hydrologic soil groups A or B, if the seasonal high water table is at least three (3) feet below the final grade elevation, and any underlying bedrock is at least

six feet below the final grade elevation.

b. All runoff directed into an infiltration basin shall first flow through a pretreatment practice such as a grass channel or filter strip to remove coarser sediments that could cause a loss of infiltration capacity.

c. During construction, all runoff from disturbed areas of the site shall be diverted away from the proposed infiltration basin site. No construction equipment shall be allowed within the infiltration basin site to avoid soil compaction.

d. See also Section 16.

4. Additional criteria applying to underground facilities:

a. Underground storage systems with infiltration must have adequate pretreatment of suspended sediments included in the design and documented in the SWP3 in order to minimize clogging of the infiltrating surface. Pretreatment shall concentrate sediment in a location where it can be readily removed. Examples include media filters situated upstream of the storage or other suitable alternative approved by Ohio EPA.

b. For infiltrating underground systems, pretreatment shall be 80% effective at capturing total suspended solids according to the testing protocol established in the Alternative Post Construction BMP Testing Protocol.

c. For non-infiltrating, underground extended detention systems, pretreatment shall be 50% effective at capturing total suspended solids according to the testing protocol established in the Alternative Post Construction BMP Testing Protocol.

5. Additional criteria for dry and wet extended detention facilities:

a. The outlet shall be designed to not release more than the first half of the water quality volume in less than one-third (1/3) of the drain time. A valve or sump shall be provided to drain any permanent pool volume for removal of accumulated sediments. The outlet shall be designed to minimize clogging, vandalism, maintenance, and to promote the capture of floatable pollutants.

b. The basin design shall incorporate the following features to maximize multiple uses, aesthetics, safety, and maintainability:

(1) Basin side slopes above and below the permanent pool shall have a run to rise ratio of 4:1 or flatter.

(2) The perimeter of all permanent pool areas deeper than four (4) feet shall be surrounded by an aquatic bench that extends at least eight (8) feet and no

more than fifteen (15) feet outward from the normal water edge. The six (6) feet wide portion of the aquatic bench closest to the shorelineshall have an average depth of six (6) inches below the permanent pool to promote the growth of aquatic vegetation. The remainder of the aquatic bench shall be no more than fifteen (15) inches below the permanent pool to minimize risk to persons who accidentally or intentionally enter the basin, and to limit growth of dense vegetation in a manner that allows waves and mosquito predators to pass through the vegetation. The maximum slope of the aquatic bench shall be ten (10) (H) to 1 (V). The aquatic bench shall be planted with hardy plants comparable to wetland vegetation that are able to withstand prolonged inundation.

(3) A forebay shall be placed at all basin inlets with a volume equal to at least at least ten (10)% of the water quality volume (WQv). A micropool shall also be placed at the basin outlet with a volume equal to at least at least ten (10)% of the water quality volume (WQv).

c. **Thermal Impacts**
To reduce thermal impacts, shade the permanent pool and open channels. Provide a landscape plan showing shade trees, subject to approval by the Lorain County Engineer's Office.

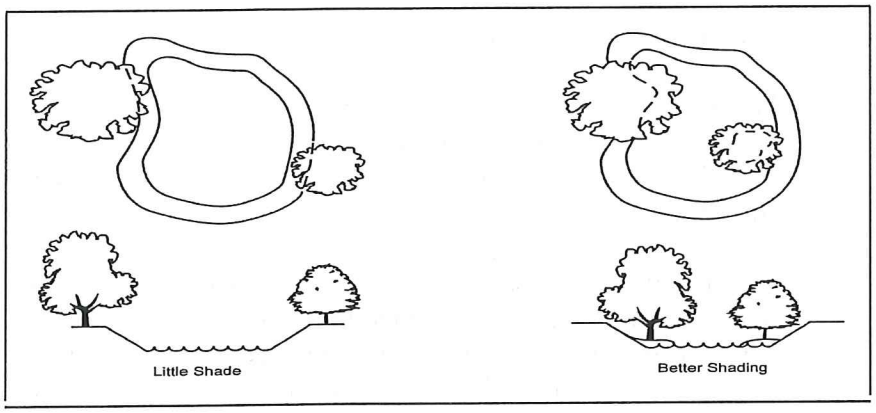


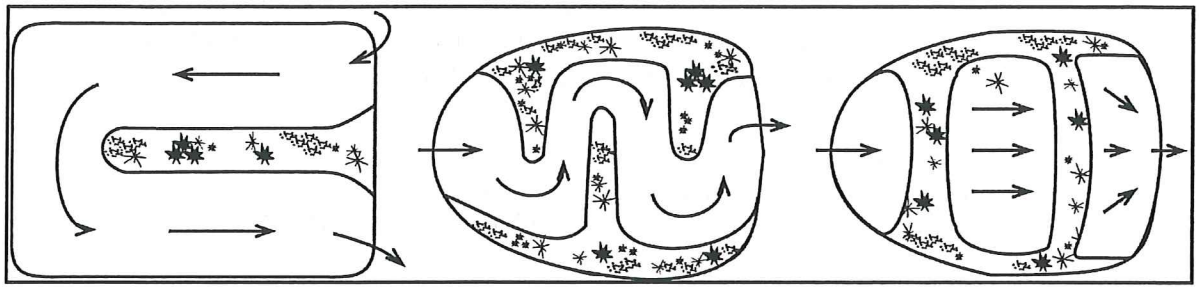
Figure: 2.6.7 Tree Placement to Shade Pond and Reduce Thermal Impacts

d. **Basin Embankment** - Construct the embankment with suitable soils. A qualified professional engineer shall conduct an on-site evaluation of the proposed pond site and borrow areas prior to final design to characterize the adequacy of the site and the excavated soils for use as core trench or embankment fill. The evaluation should include a test pit at each abutment, along the centerline of the proposed embankment, the emergency spillway, the borrow area and the pool area. Approximately one test pit should be placed for every 10,000 square feet of area examined. All explorations shall be logged using the Unified Soil Classification System. Embankment design shall be sealed by the qualified professional engineer.

e. **Wet or Dry Basin Configuration** – Configure the basin so that water quality treatment

is optimized through basin shape and flow length. Improved settling of pollutants occurs as the flow length is maximized. Optimally, designs will avoid the problems of dead storage or incoming water short- circuiting through the pond and the re-suspension of deposited sediments.

1. **Length to Width Ratio -** Wedge shaped or basins that are longer than wide will prevent flow from short-circuiting the main body of water. The ratio of flow length to basin width should be at least 3:1. To increase a basin's flow length, the contours of the basin may be configured with baffles or an extended flow path. Construct submerged aquatic benches to form cells to enhance flow routing.

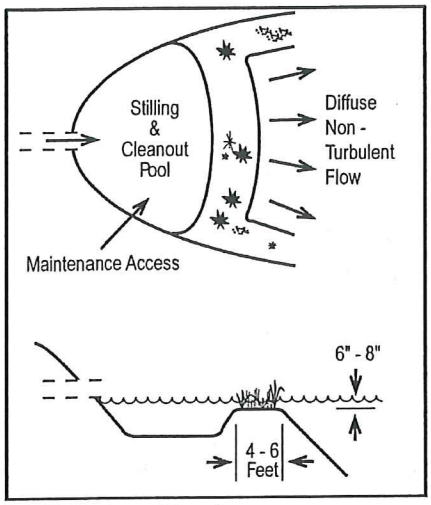


Flow Routing to Enhance Water Quality Treatment

2. **Slide Slopes** – Varying the slope to create benches above and below waterlines increases safety and stability and can create water quality features such as wetland benches in permanent pools. Slopes should not be steeper than 4:1 or gentler than 12:1.

3. **Forebay (s)** – A forebay is a settling pool located at the inlet to a pond. It is separated from the rest of the pond by a level dike often planted with emergent wetland vegetation. Forebays are primarily used to improve the settling efficiency of a pond but they also reduce maintenance by promoting settling in a confined, easily accessible location.

   Forebays promote settling by: segmenting or dividing the pond into cells which reduce mixing and promote plug flow; by converting the high velocity concentrated inflow from a pipe to a wide uniform slow flow to the normal pool area, and by dissipating flows through emergent vegetation.



Forebay

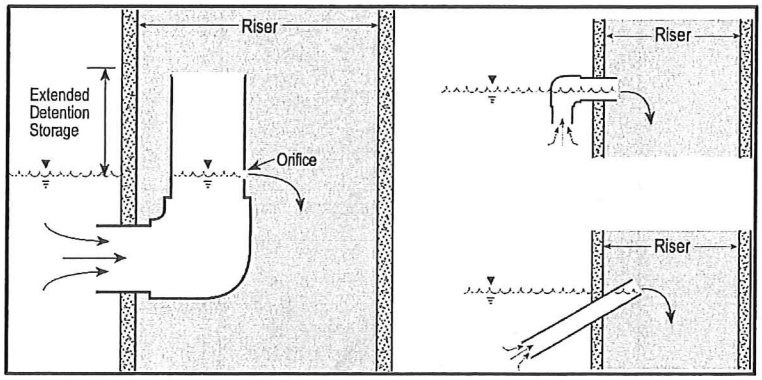
4. **Forebay Size** – Forebay for single inlet should occupy from 8-25% of the normal pool area. Forebays should be large enough to avoid scour and re-suspension of trapped sediment and sized for ease of construction and cleanout. Forebays should have a water depth of at least three (3) feet.

5. **Forebay Outlet** – Provide an outlet to the main pond, consisting of a level spreader or submerged level dike. A submerged dike separating the Forebay from the rest of a wet pool or wetland should be 6-12 inches below the normal water surface elevation and provide a non-erosive overflow. It should also be planted with hardy emergent wetland vegetation. See the wetland extended detention pond section below for more information on planting.

6. **Forebay Maintenance Access** – To accommodate relatively frequent sediment cleanout, provide easy equipment access to the forebay. Include gradual slopes without obstructions and an access easement. Additionally, install a drain under the dike so that the Forebay can be drained during maintenance operations.

f. **Micro-pool** – For wetland and dry extended detention Stormwater basins, a micro-pool is also required in front of the outlet. The micro-pool allows a reverse slope pipe or other non-clogging outlet to be used. The micro-pool should be 4-6 feet deep and equal to ten (10)% of the water quality volume.

g. **Non-clogging Outlet** –Provide a minimum two (2) inch diameter water quality orifice and a reverse flow pipe or other non-clogging outlet or as otherwise approved by the Lorain County Engineer.



Reverse Flow Structures Reduce Clogging and Trap Floating Pollutants

h. **Pond Drain** – Install a drain such that the entire basin can be drained for maintenance or repair purposes.

i. **Auxiliary "Emergency Spillway"** – Construct auxiliary spillways according to Section 9.A.6.

j. **Additional Specifications for Basin Construction** – basins shall be well constructed and built according to NRCS Conservation Practice Standards 378 (Pond) addressing issues such as:

1. Basins shall incorporate emergency spillways designed to safely convey flows exceeding design storm flows.

2. Outlet structures should be built to withstand flotation and incorporate anti-vortex and debris or trash rack devices.

3. Embankments and principal spillway shall utilize adequate soils and compactions, core trenches and anti-seep collars.

k. **Transition from Temporary Sediment Control Basin to permanent Stormwater Management Basin** – Often permanent Stormwater management basins are used for sediment control during construction. In most cases, these facilities will need dewatering and sediment removal in order to ensure that the pond has the appropriate permanent volume for Stormwater design. This includes removal of temporary risers used for sediment control, opening orifices and windows on the outlet structure that were temporarily plugged to comply with the sediment basin outlet detail in the Erosion and Sediment Control Plan, and reseeding bare soil or establishing wetland vegetation in designated areas within the basin.

l. **Permanent Pool Depth** – For Wet Extended Detention Basins – The mean depth of the permanent pool should be between three (3) and six (6) feet in order to optimize settling of suspended particles. This is calculated by dividing the permanent pool's storage volume by the pool's surface area. A pool that varies in depth will allow diverse

conditions for wetland vegetation and portions which are deep enough for fish. If fish are to be maintained in the pool, approximately 25% of the pool should be at least six (6) to eight (8) feet deep. Provide 4:1 side slope both above and below the permanent pool.

6. Criteria for the Acceptance of Alternative post-construction BMPs: The applicant may request approval from the Lorain County Engineer for the use of alternative structural post-construction BMPs in accordance with the current Ohio EPA Construction General Permit, and with Section 10.

7. Storm Water Quality on Redevelopment Projects: Provide storm water quality in accordance with the current Ohio EPA Construction General Permit for redevelopment projects.

D. Storm Water Rate Control

The Comprehensive Storm Water Management Plan shall describe how the proposed storm water management practices are designed to satisfy the following requirements for storm water rate or quantity control for each watershed in the development:

1. The peak discharge rate of runoff from the Critical Storm and from all more frequent storms that occur under post-development conditions shall not exceed the peak discharge rate of runoff from a 1-year, 24-hour storm occurring on the same development drainage area under pre-development conditions.

2. Pre-development runoff calculations shall reflect historic vegetative cover as meadow or woods (not agriculture). Post-development runoff calculations shall reflect adjusted Hydrologic Soil Group (HSG) classifications according to the OEPA Rainwater and Land Development Manual Appendix 9.

3. Storms of less frequent occurrence (longer return periods) than the Critical Storm, up to the 100-year, 24-hour storm shall have peak runoff discharge rates no greater than the peak runoff rates from equivalent size storms under pre-development conditions.The 1, 2, 5, 10, 25, 50, and 100-year storms shall be considered in designing a facility to meet this requirement.

4. The Critical Storm for each specific development drainage area shall be determined as follows, but shall be no less than the 5-year critical storm:

   a. Determine, using a curve number-based hydrologic method that generated hydrologic method that generates hydrographs, or other hydrologic method approved by the Lorain County Engineer, the total volume (acre-feet) of runoff from a 1-year, 24-hour storm occurring on the entire development drainage area before and after development. These calculations shall meet the following standards:

      1. Calculation shall include the lot coverage assumptions used for full build out as proposed.

      2. Calculations shall be based on the development drainage area (as defined in

Section 2).

3. To account for future post-construction improvements to the site, calculations shall assume an impervious surface such as asphalt or concrete for all parking areas and driveways, regardless of the surfaceproposed in the site description.

b. From the volume determined the percent increase in volume of runoff due to development. Using the percentage, select the 24-hour Critical Storm at Table 3 on page 40.

Table 3: 24-Hour Critical Storm

If the Percentage of Increase in Volume of Runoff is:		**The Critical Storm will be:**
Equal to or Greater Than:	and Less Than:	
----	10	1 year
10	20	2 year
20	50	5 year
50	100	10 year
100	250	25 year
250	500	50 year
500	---	100 year

For example, if the percent increase between the pre- and post-development runoff volume for a 1-year storm is 35%, the Critical Storm will be a 5-year storm. The peak discharge rate of runoff for all storms up to this frequency shall be controlled so as not to exceed the peak discharge rate from the 1-year frequency storm under pre-development conditions in the development drainage area. The post-development runoff from all less frequent storms need only be controlled to meet pre-development peak discharge rates for each of those same storms.

10. ALTERNATIVE ACTIONS

A. When the Lorain County Engineer determines that site constraints compromise the intent of this regulation, off-site alternatives may be used that result in an improvement of water quality and a reduction of storm water quantity. Such alternatives shall meet the following standards:

1. Shall achieve the same level of storm water quantity and quality control that would be achieved by the on-site controls required under this regulation.

2. Implemented in the same Hydrologic Unit Code (HUC) 14 watershed unit as the proposed development project.

3. The mitigation ratio of the water quality volume is 1.5 to 1 or the water quality volume at the point of retrofit, whichever is greater.

4. An inspection and maintenance agreement as described in Chapter 8.0 – D.10 is established to ensure operations and treatment in perpetuity.

5. Obtain prior written approval from Ohio EPA.

B. Alternative actions may include, but are not limited to the following. All alternative actions shall be approved by the Lorain County Engineer:

1. Fees, in an amount specified by Lorain County Soil & Water Conservation District to be applied to community-wide storm water management practices.

2. Implementation of off-site storm water management practices and/or the retrofit of an existing practice to increase quality and quantity control.

3. Stream, flood plain, or wetland restoration.

4. Acquisition or conservation easements on protected open space significantly contributing to storm water control such as wetland complexes.

11. EASEMENTS

Access to storm water management practices as required by Lorain County Engineer for inspections and maintenance shall be secured by easements in favor of the Lorain County Commissioners. The following conditions shall apply to all easements:

A. Easements shall be included in the Inspection and Maintenance Agreement submitted with the Comprehensive Storm Water Management Plan.

B. Easements shall be approved by Lorain County Engineer prior to approval of a final plat and shall be recorded with the Lorain Recorder and on all property deeds.

C. Unless otherwise required by Lorain County Engineer access blocks or easements between a public right- of-way and all storm water management practices shall be no less than twenty-five (25-feet)wide. The easement shall also incorporate the entire practice plus an additional twenty-five (25- foot) wide band around the perimeter of the storm water management practice.

D. The easement shall be graded and/or stabilized as necessary to allow maintenance equipment to access and maneuver around and within each facility, as defined in the Inspection and Maintenance Agreement for the site.

E. Easements to structural storm water management practices shall be restricted against the construction therein of buildings, fences, walls, and other structures that may obstruct the free flow of storm water and the passage of inspectors and maintenance equipment; and against the changing of final grade from that described by the final grading plan approved by the Administrator. Any re-grading and/or obstruction placed within a maintenance easement may be removed by Lorain County at the property owners' expense.

12. MAINTENANCE AND FINAL INSPECTION APPROVAL

To receive final inspection and acceptance of any project, or portion thereof, the following shall be completed and submitted to Lorain County Engineer:

A. Final stabilization shall be achieved and all permanent storm water management practices shall be installed and made functional, as determined by Lorain County Engineer and per the approved Comprehensive Storm Water Management Plan.

B. An As-Built Certification, including a Survey and Inspection, shall be sealed, signed and dated by a Professional Engineer and a Professional Surveyor with a statement certifying that the storm water management practices, as designed and installed, meet the requirements of the Comprehensive Storm Water Management Plan approved by Lorain County Engineer. In evaluating this certification, Lorain County Engineer may require the submission of a new set of storm water practice calculations if he/she determines that the design was altered significantly from the approved Comprehensive Storm Water Management Plan. The As-Built Survey shall indicate the location, dimensions, elevations, and volumes of such practices. Include the entity responsible for long-term maintenance as detailed in the Inspection and Maintenance Agreement.

C. Include in the certification, the as-built volumes and key invert and overflow elevations of SCMs.

D. Provide to the Lorain County Engineer, the complete and recorded Inspection and Maintenance Agreement as specified inSection 8.0.

13. ON-GOING INSPECTIONS

The Lorain County Soil & Water Conservation District and or Lorain County Engineer may inspect storm water management practices after acceptance. Upon finding a malfunction or other need for maintenance, the Lorain County Engineer shall provide written notification to the responsible party, as detailed in the Inspection and Maintenance Agreement, of the need for maintenance. Upon notification, the responsible party shall within ***five (5) working days***, or other mutually agreed upon time, make repairs or submit a plan with detailed action items and established timelines. Should repairs not be made within this time, or a plan approved by the Lorain County Engineer for these repairs not be in place, the Lorain County Engineer may undertake the necessary repairs and assess the responsible entity.

14. FEES

The Comprehensive Storm Water Management Plan review, filing, and inspection fees are part of a complete submittal and shall be submitted to the Administrator before the review process begins. The Lorain County Storm Water Management District shall establish a fee schedule based upon the actual estimated cost for providing these services. All fees are payable to the Lorain County Commissioners. For Fee Schedule see page 48.

15. BOND

A. If a Comprehensive Storm Water Management Plan is required by this regulation, soil-disturbing activities shall not be permitted until a maintenance bond ***of 100% of the total project cost of the storm water facilities***, has been deposited with the Lorain County Engineer. This bond shall be posted for the Lorain County Soil & Water Conservation District to perform the obligations otherwise to be performed by the owner of the development area as stated in this regulation and to allow allwork to be performed as needed in the event that the applicant fails to comply with the provisions of this regulation. The maintenance bond will be returned, less administrative fees established by Lorain County, when the following three criteria are met:

1. 100% of the total project has been permanently stabilized.

2. An As-Built Inspection of all SCMs is conducted by the Lorain County Engineer.

3. An Inspection and Maintenance Agreement signed by the developer, the contractor, theLorain County Engineer, and the private owner or homeowners association who will take long-term responsibility for these SCMs, is accepted by the Lorain County Storm Water District.

B. Once these criteria are met, the applicant shall be reimbursed all bond monies that were not used for any part of the project. If all of these criteria are not met after three years of permanent stabilization of the site, Lorain County may use the bond monies to remedy any outstanding issues with all storm water management structures on the site and the remainder of the bond shall be given to the private lot owner/ homeowners association for the purpose of long term maintenance of the project.

16. INSTALLATION OF STORM WATER CONTROL MEASURES (SCMs)

The operator may not direct runoff through any water quality SCMs and structures or portions thereof that could be degraded by construction site sediment until the entire area tributary to the structure has reachedfinal stabilization as determined by Lorain County Soil & Water Conservation District. Final stabilization requires the completion of the final grading at the site, all of the utilities installed, and the site subsequently stabilized with vegetation or other appropriate methods. The operator shall provide documentation acceptable to Lorain County Soil & Water Conservation District to demonstrate that the site is completely stabilized. Upon this proof of compliance, the water quality SCMs and structure(s) may be installed and placed into service. Schedule and sequence construction operations accordingly to protect water quality SCMs from sediment clogging. Upon completion of installation of these practices, all disturbed areas and/or exposed soils caused by the installation of these practices shall be stabilized within seven (7) days.

17. MONITORING FOR COMPLIANCE: ENFORCEMENT

A. Following the initial inspection of control devices by the project engineer, regular inspections will be performed by the Administrator for compliance with these Rules. If it appears that a violation of any of these Rules has occurred, the owner and developer will be notified of deficiencies or noncompliance in writing by certified mail, return receipt requested.

B. The rules shall be enforced in accordance with O.R.C. 307.79 and at a minimum shall permit: The Board of County Commissioners or any duly authorized representative of the Board may, upon identification to the owner or person in charge, enter any land upon obtaining agreement with the owner, tenant, or manager of the land in order to determine whether there is compliance with the rules adopted under this section. If the Board or its duly authorized representative is unable to obtain such an agreement, the Board or representative may apply for, and a judge of the Lorain County Common Pleas Court inspection warrant as necessary to achieve the purposes of this chapter.

1. If the Board of County Commissioners or its duly authorized representative determines that a violation of the rules adopted under this section exists, the Board or representative may issue an immediate stop work order if the violator failed to obtain any federal, state or local permit necessary for sediment and erosion control, earth movement, clearing, or cut and fill activity. In addition, if the Board or representative determines such a rule violation exists, regardless of whether or not the violator has obtained the proper permits, the Board or representative may authorize the issuance of a notice of violation. If, after a period of not less than thirty – (30) days has elapsed following the issuance of the notice of violation, the violation continues, the Board or its duly authorized representative shall issue a second notice of violation. Except as provided in division Subsection (3) of this section, if after a period of not less than fifteen (15) days has elapsed following the issuance of the second notice of violation, the violation continues, the Board or its duly authorized representative may issue a stop work order after first obtaining the written approval of the prosecuting attorney of the county if, in the opinion of the prosecuting attorney, the violation is egregious.

   Once a stop work order is issued, the Board or duly authorized representative shall request, in

writing, the prosecuting attorney of the county to seek an injunction or other appropriate relief in the court of common pleas to abate excessive sedimentation and secure compliance with the rules adopted under this section. If the prosecuting attorney seeks an injunction or otherappropriate relief, then, in granting relief, the Court of Common Pleas may order the construction of sediment control improvements or implementation of other control measure and may assess a civil fine of not less than one hundred or more than five hundred dollars. Each day of violation of a rule or stop work order issued under this section shall be considered aseparate violation subject to a civil fine.

2. The person to who a stop work order is issued under this section may appeal the order to Lorain County Common Pleas Court issued, seeking any equitable or other appropriate relief from that order.

3. No stop work order shall be issued under this section against any public highway transportation, or drainage improvement or maintenance project undertaken by a governmentagency or political subdivision in accordance with a statement of its standard sediment control policies that is approved by the Board or the Chief of the Division of Soil and Water Conservation, Ohio Department of Natural Resources.

The Administrator shall have the authority to require immediate on-site adjustments to the Comprehensive Storm Water Management Regulations in order to achieve compliance with these Rules.

A final inspection will be made to determine if the criteria of these Rules have been satisfied and a report will be presented to the Board of Lorain County Commissioners on the site's compliancestatus.

The Administrator will monitor soil-disturbing activities for non-farm residential, commercial, industrial, or other non-farm purposes on land of less than one contiguous acre to ensure compliance required by these Rules.

The Administrator shall not review or approve Comprehensive Stormwater Management Plans, of any type, for applicants that have an existing development project or site(s) that is not in compliance with its approved erosion and sediment control plan, or a project site(s) that is otherwise not in compliance with the Lorain County Comprehensive Stormwater ManagementPlan.

The Administrator shall not review or approve Lorain County Comprehensive Stormwater Management Plans for sublots or other areas within existing development projects that are not in compliance with its approved erosion and sediment control plan or otherwise not in compliance with the Lorain County Comprehensive Stormwater Management Plans. Such development projects include but not limited to, subdivisions or other common plans of development

The County of Lorain reserves the right to withhold relevant inspections and/or other approvalsfrom its departments and/or agencies for development projects or activities in support of development projects that are not in compliance with these Rules.

The County shall not issue building permits for projects regulated under the Lorain County Comprehensive Stormwater Management Plan that have not received approval for a Comprehensive Stormwater Management Plan for said project(s).

18. VIOLATIONS

No person shall violate or cause or knowingly permit to be violated any of the provisions of this regulation, or fail to comply with any of such provisions or with any lawful requirements of any public authority made pursuant to this regulation, or knowingly use or cause or permit the use of any lands in violation of this regulation or in violation of any permit granted under this regulation.

19. APPEALS

Any person receiving a denial of permit may appeal the determination to the Board of Commissioners or its designee. The Notice of Appeal shall be mailed to the Clerk of the Board of Commissioners within 14 days of the Notice of Denial. A hearing shall take place within thirty (30) days of receipt of the Notice. Written notice of the hearing will be sent to the appellant.

20. PENALTY

No person, firm, entity or corporation; including but not limited to, the owner of the property, his agents and assigns, occupant, property manager, and any contractor or subcontractor shall violate any rule adopted or order issued under this Regulation. Notwithstanding Section 17.B, if the Board of County Commissioners determines that a violation of any rule adopted or administrative order issued under this Regulation exists, the Board may request, in writing, the prosecuting attorney of the County to seek an injunction or other appropriate relief in the Court of Common Pleas to abate storm water management and secure compliance with the rules or order. In granting relief, the Court of Common Pleas may order the construction of sediment control improvements or implementation of other control measures any may assess a civil fine or not less than one hundred ($100.00) or more than five hundred dollars ($500.00). Each day of violation or a rule adopted or administrative order issued under this section shall be considered a separate violation subject to a civil fine.

21. CONTRACTOR REGISTRATION

Contractors planning to perform comprehensive storm water management related construction activities must be registered with the Lorain County Storm Water Management District. To become registered the contractor must have on staff and in responsible charge of comprehensive storm water management permit compliance a certified inspector. Lorain County Stormwater Management District will keep on file specific requirements and application forms which may be updated as needed for contractor registration.

In order to obtain a Comprehensive Storm Water Management permit the applicant must include the name and contact information of the registered contractor that will be performing the work.

Appendix A
Inspection and Maintenance Agreement for SCMs

INSPECTION AND MAINTENANCE AGREEMENT
FOR STORM WATER CONTROL MEASURES

This Inspection and Maintenance Agreement, made this _____ day of _____ 20____, by and between _____ (hereafter referred to as the "Owner") and the ***Lorain County Storm Water Management District***, provides as follows:

WHEREAS, the Owner is responsible for certain real estate described as Lorain County Auditor's Tax Map Parcel No._____, located at _____ ___ ***(complete street address, or attach legal description of the property)*** that is to be developed as _____ ___ ***(development's official name),*** and referred to as the "Property;" and,

WHEREAS, the Owner is providing a storm water management system consisting of the following storm water control measures (SCMs):

1.
2.
3.
4. ***(list all SCMs here)***
5.

as shown and described on the attached Comprehensive Storm water Management Plan ***attached and incorporated fully herein and Marked as "Exhibit A"***; also on file with the Lorain County Storm Water Management District, and,

WHEREAS, to comply with Comprehensive Storm Water Management Regulations of Lorain County, as they exist on the date of this agreement pertaining to this project, the Owner hereby agrees to inspect, operate, maintain, and repair the SCMs in accordance with the terms and conditions hereinafter set forth.

NOW, THEREFORE, for and in consideration of the mutual covenants and undertaking of the parties, the parties hereby agree as follows:

A. FINAL INSPECTION and APPROVAL

1. The Owner shall record all easements as described in Section 11.0 of the Comprehensive Storm Water Management Regulations, and shall submit copies thereof to the Lorain County Engineer.

2. The Owner shall install and make functional all SCMs, and request a final inspection by the Lorain County Engineer, as described in Section 12.0 (A) of the Comprehensive Storm Water Management Regulations.

3. The Owner shall further submit to the Lorain County Engineer the Owner's Professional Engineer's as-built Comprehensive Storm Water Management Plan that includes the Engineer's Certification and Inspection, and the Owner's Professional Surveyor's As-Built Survey, as described in Section 12.0 (B) of the Comprehensive Storm Water Management Regulations.

4. The Owner shall further record this complete Inspection and Maintenance Agreement, including copies of the approved Inspection and Maintenance Plan; and the Owner shall submit copies thereof to the Lorain County Engineer as described in Section 12.0 (C) of the Comprehensive Storm Water Management Regulations.

5. Within 30 days of receipt of the above documents, the Lorain County Engineer shall then make a final inspection of SCMs, and the Owner shall make any necessary repairs as described in Section 13.0 of the Comprehensive Storm Water Management Regulations.

6. The Owner shall further pay all fees in accordance with Section 14.0 of the Comprehensive Storm Water Management Regulations.

7. Within 30 days of satisfactory completion of all these requirements, the Lorain County Engineer shall approve in writing, and shall notify the ***Lorain County Storm Water Management District*** that the SCMs are constructed in accordance with the approved plans and specifications of the approved Comprehensive Storm Water Management Plan.

8. The Inspection and Maintenance agreement may be amended with approval from the ***Lorain County Storm Water Management District*** for any subsequent phases of construction.

B. MAINTENANCE of STORMWATER CONTROL MEASURES

1. The Owner agrees to maintain in perpetuity the SCMs in accordance with the approved Maintenance Plans described in #2 below, and in a manner that will permit the SCMs to perform the purposes for which they were designed and constructed, and in accordance with the standards by which they were designed and constructed, all as shown and described in the approved Comprehensive Storm Water Management Plan. This includes all pipes and channels built to convey storm water to the SCMs, as well as structures, improvements, established elevations and grades, grading, vegetation, practices, and non-structural measures provided to control the quantity and quality of the storm water runoff.

2. The Owner shall provide a Maintenance Plan for each SCM. The Maintenance Plans shall include the following:

   i. The location of each SCM and identification of the drainage areas served by each SCM.

ii. Photographs of each SCM, including all inlets and outlets upon completion of construction.

iii. A schedule of inspection.

iv. A schedule for regular maintenance for each aspect of the SCM and description of routine and non-routine maintenance tasks to ensure continued performance of the SCM as detailed in the approved Comprehensive Storm Water Management Plan. The Owner shall also provide a maintenance inspection checklist written so the average person can understand it. The maintenance plan shall include detailed drawings of each SCM and outlet and control structures (with the parts of the structures labeled). This schedule may include additional standards, as required by the ***Lorain County Storm Water Management District***, to ensure continued performance of SCMs permitted to be located in, or within 50 feet of, water resources.

v. Location and documentation of all access routes and access and maintenance easements on the Property.

Alteration or termination of these stipulations is prohibited, without written approval from the ***Lorain County Storm Water Management District.***

3. The Owner shall maintain, update, and store the inspection, maintenance and repair records for the SCMs.

4. The Owner shall regularly inspect, shall perform all maintenance in accordance with the Inspection and Maintenance Plan, and shall complete all repairs identified, and any additional repairs or improvements necessary to make the SCMs function properly as requested in writing by the ***Lorain County Storm Water Management District.***

C. INSPECTION, MAINTENANCE and REPAIR of SCMs

1. During the first year of operation, the Owner shall inspect all SCMs listed in this Agreement, at a minimum of every three (3) months, and after major storm water runoff events.

2. The Owner's Professional Engineer shall inspect all SCMs listed in this Agreement at least once each year, and shall submit his report to the ***Lorain County Storm Water Management District*** including his recommendations and including his summary of the prior year's activities.

3. Upon request, The Owner shall submit Inspection Reports, Maintenance Logs, and Repair Records in writing, in a form acceptable to the District, to the ***Lorain County Storm Water Management District*** within seven (7) days.

4. The Owner grants permission to the ***Lorain County Storm Water Management District*** to enter the Property with prior notification to the Owner to inspect all aspects of the SCMs and related drainage whenever the ***Lorain County Storm Water Management District*** deems necessary to verify that the SCMs are being maintained and operated in accordance with the terms and conditions hereinafter set forth. The ***Lorain County Storm Water Management District*** shall maintain public records of these

reports of such site inspections, and shall deliver copies of said reports to the Owner, and shall indicate in writing any corrective actions and repairs or improvements necessary to make the SCMs function properly.

5. The Owner shall complete all corrective actions and repairs within five (5) working days of their discovery through Owner inspections, or through a request from the ***Lorain County Storm Water Management District.*** If repairs do not occur within this five (5) day period, the Owner shall request written approval from the ***Lorain County Storm Water Management District*** for his schedule of repairs.

6. In the event of any default or failure by the Owner in the performance of any of the covenants and warranties pertaining to the maintenance of the SCMs, or in the event the Owner fails to maintain the SCMs in accordance with the approved design standards and Inspection and Maintenance Plan, or, in the event of an emergency as determined by the ***Lorain County Storm Water Management District,*** in the sole discretion of the ***Lorain County Storm Water Management District,*** after providing reasonable notice to the Owner, may enter the property and take whatever steps necessary to correct deficiencies and to charge the cost of such repairs to the Owner. The Owner shall reimburse the ***Lorain County Storm Water Management District*** upon demand, within ten (10) days of receipt thereof for all actual cost incurred by the ***Lorain County Storm Water Management District*** (or later with written permission from the ***Lorain County Storm Water Management District***). All costs expended by the ***Lorain County Storm Water Management District*** in performing such necessary maintenance or repairs shall constitute a lien against the properties of the Owner. Nothing herein shall obligate the ***Lorain County Storm Water Management District*** to maintain the SCMs.

D. FUNDING

The Owner shall specify the method of funding for the perpetual inspection, operation, and maintenance of the SCMs listed in this Inspection and Maintenance Agreement. A description of the funding mechanism shall be submitted with its application to the ***Lorain County Storm Water Management District*** and approved by the ***Lorain County Storm Water Management District.***

E. INDEMNIFICATION

1. The Owner hereby agrees to save, hold harmless, and to indemnify the ***Lorain County Storm Water Management District*** and its employees and officers and agents from and against all liability, losses, claims, demands, costs and expenses arising from, or out of, default or failure by the Owner to maintain the SCMs, in accordance with the terms and conditions set forth herein, and from acts of the Owner arising from, or out of, the construction, operation, repair or maintenance of the SCMs.

2. The Owner hereby releases the ***Lorain County Storm Water Management District*** from all damages, accidents, casualties, occurrences, or claims that might arise or be asserted against the ***Lorain County Storm Water Management District*** from the presence, existence, or maintenance of the SCMs.

3. The parties hereto expressly do not intend by execution of this Inspection and Maintenance Agreement to create in the public, or any member thereof, any rights as a third party beneficiary, nor to authorize anyone not a party hereof to maintain a suit for any damages pursuant to the terms of this Inspection and Maintenance Agreement.

4. This Inspection and Maintenance Agreement shall be a covenant that runs with the land and shall inure to the benefit of and shall be binding upon the parties hereto, their respective successors and assigns, and all subsequent owners of the property.

5. The current Owner shall promptly notify the ***Lorain County Storm Water Management District*** when the Owner legally transfers any of the Owner's responsibilities for the SCMs. The Owner shall furnish to the ***Lorain County Storm Water Management District*** a copy of any document of transfer, executed by both parties.

6. Upon execution of this Inspection and Maintenance Agreement, The ***Lorain County Storm Water Management District*** shall record it in the Recorder's Office of ***Lorain County***, Ohio, at the Owner's expense.

7. In the event that the ***Lorain County Storm Water Management*** District shall determine in its sole discretion that any or all of the SCMs are no longer necessary, then the ***Lorain County Storm Water Management District*** shall, at the request of the Owner, execute and record a release of this agreement, at the Owner's expense.

IN WITNESS WHEREOF, the Owner has caused this Inspection and Maintenance Agreement to be signed in its name by a duly authorized person.

By:_____, its _____
Owner (signature and title)

_____, _____
Owner (please print signatory's name and name of Owner)

State of: _____
County of:_____

Subscribed and Sworn to me on this _____day of _____20_____ by _____.

_____
Notary Signature

By:_____, PE, PS
Lorain County Engineer, on behalf of the Lorain County Storm Water Management District

State of: _____
County of:_____

Subscribed and Sworn to me on this _____day of _____20_____ by _____.

_____
Notary Signature

Approved as to form_____
By: Assistant County Prosecutor

_____
Print Name

This instrument prepared by the Lorain County Storm Water Management District

Appendix B
Application Form & Fee Schedule

COMPREHENSIVE STORM WATER MANAGEMENT
(POST CONSTRUCTION)
APPLICATION FORM
LORAIN SOIL AND WATER CONSERVATION DISTRICT

ALL NECESSARY INFORMATION MUST BE PROVIDED ON THIS FORM. THE REVIEW AND INSPECTION FEE SHALL BE SUBMITTED WITH THE DEVELOPMENT PLAN. PLANS SHALL NOT BE REVIEWED UNTIL THE FEE HAS BEEN PAID.

1. Owner Information

Name_____ Phone_____

Address_____ Fax/Email_____

City_____ State_____ Zip_____

2. Agent/Engineer/Contractor/Builder Information

Name_____ Phone_____

Contact Person_____ Phone_____

Address_____ Fax/Email_____

City_____ State_____ Zip_____

3. Subcontractors

Firm Name_____ Phone_____

Contract Person_____ Phone_____

Address_____ Fax/Email_____

City_____ State_____ Zip _____

4. Site Information

Site Name_____ Township_____ Site Address___

_____ City_____ Prior Land Uses _____

_____ Type of Construction Activity _____

_____ Project Type_____

_____ NPDES Permit #_____ Wetland Permit

#_____ Sublot #___ Phase #_____ Receiving

Watershed_____

5. Soil Disturbing Activity Information

Total Project Area (acres)_____ Estimated Completion Date _____

Total Contributing Drainage Area (acres)_____

Pre-Construction Site Conditions_____

6. Received the Following:

Yes / No Storm Water Management Plan

Yes / No 2 Copies of Storm Water Mgt Plan

Yes / No Plan Prepared by an Engineer / Surveyor

Yes / No Long Term Inspection & Maintenance Agreement

Yes/ No Narrative Report Yes / No Construction Site Plan Sheets

Yes/ No Completed Storm Water Pollution (SWP3) Checklist

7. Payment Information **Make Checks Payable to Lorain County Commissioners**

Date of Check_____Check #_____Amount $_____

8. Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision and are to the best of my knowledge and belief, true, accurate, and complete.

Printed Name_____Affiliation _____

I authorize the Lorain County Commissioners or its appointed agents to enter this property for the purposes of plan review, site inspection or compliance with the Lorain County Post Construction Rules for the duration of the project.

Signature_____Date _____

9. Approval

Approved as submitted Y N By_____Date _____

_____Disapproved – Please Correct the following items:_____

10. Approval Stamp (Lorain SWCD)

Lorain County Comprehensive Storm Water Management Plan Fee Schedule

Please make all checks payable to: Lorain County Commissioners

Single Lot Residential – Not Part of a Greater Plan of Development **Fee**

Single Projects	$ 100.00

Residential Developments Property Under Construction **Fee**

On five (5) acre or more (these fees are cumulative)	
a. for first five (5) acre	$ 800.00
b. for each additional acre or any part thereof:	$ 60.00

Non-Residential Property Under Construction **Fee**

On five (5) acre or more (these fees are cumulative)	
a. for first five (5) acre	$ 800.00
b. for all acreage over 5 acres	$ 60.00 / acre

Site Inspections **Fee**
Both Residential and Non-Residential

Sites 1 – 5 acres	$ 250.00
Each additional acre or portion thereof	$ 25.00
** ***Please note*****: Non-compliant sites will incur an additional inspection fee of $100.00 per hour for each inspection required until site meets compliance.**	

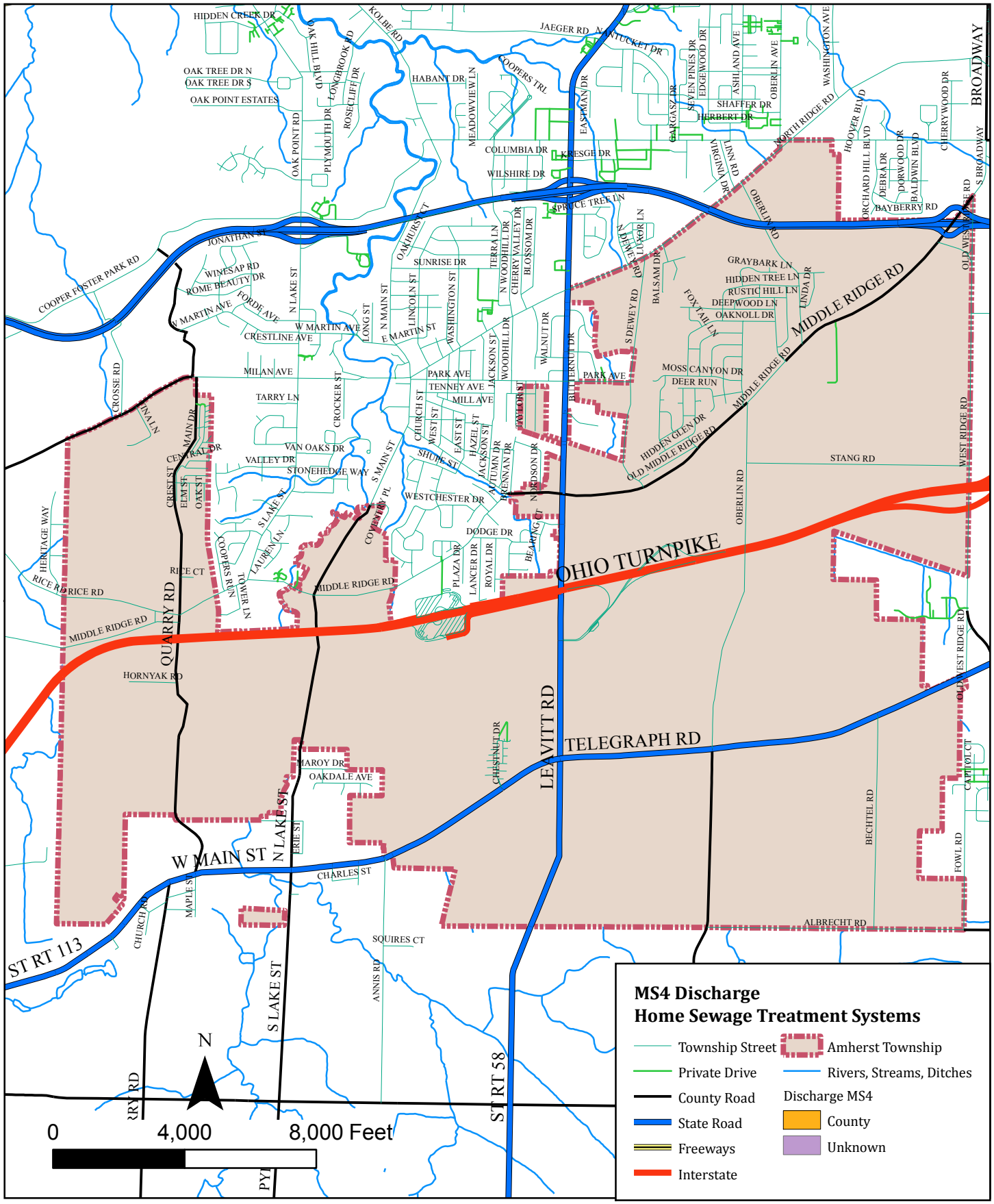
Exhibit 5 – HSTS Map and List of Addresses

MS4 HSTS Discharges

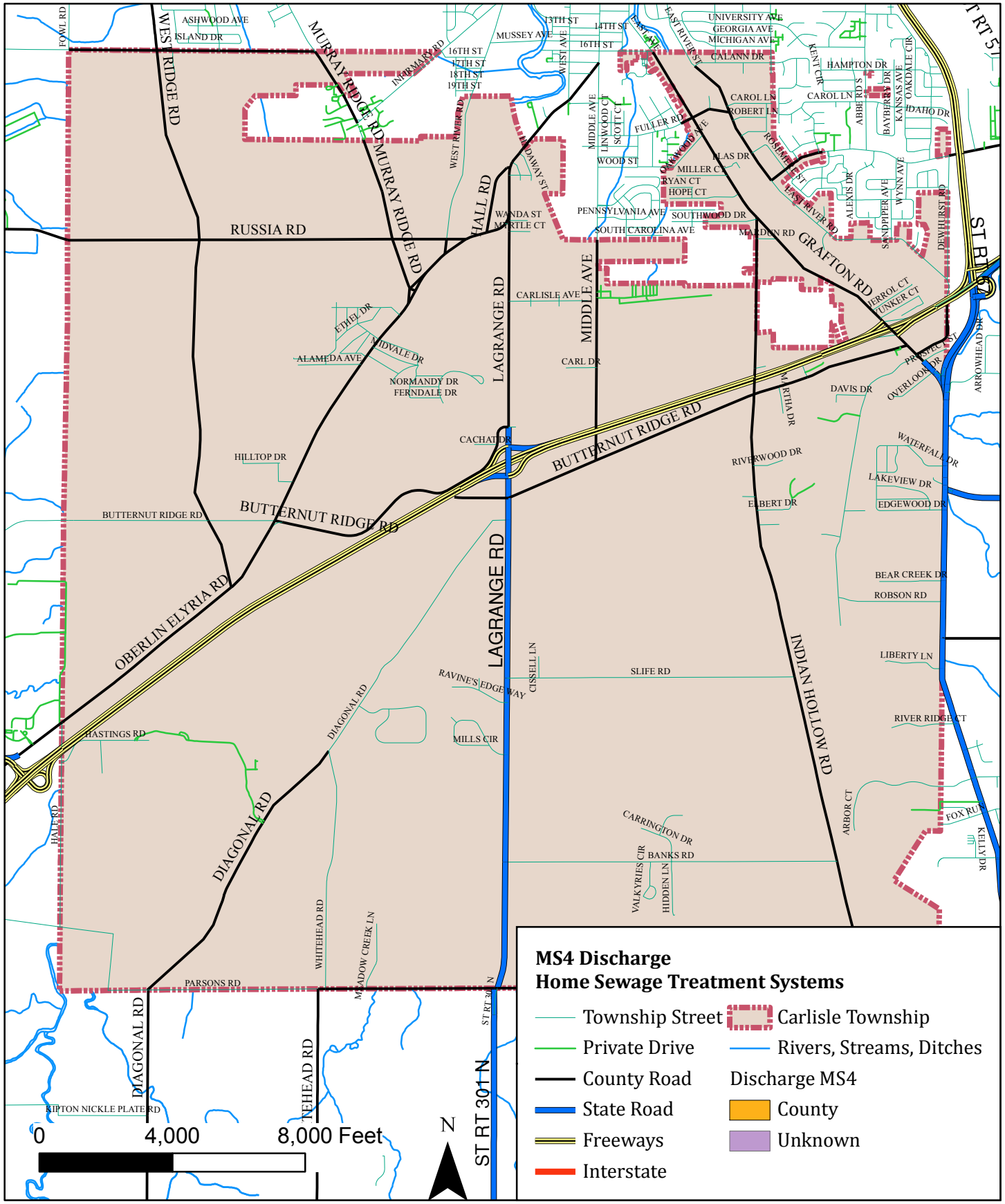
PIN	Stan_addr	Dischg_MS4	Dischg_To
0300112101062	1161 | | | NORTH RIDGE | RD | E	County	N. Ridge Rd CR1
0621005101043	6285 | | | LAKE | AVE | |	County	unknown
0621005102015	6326 | | | LAKE | AVE | |	County	Lake Avenue CR204
0621005102017	6340 | | | LAKE | AVE | |	unknown	Railway ditch or Lake Ave
0623011101032	41763 | | | GRISWOLD | RD | |	Elyria	unknown
0623011101070	6788 | | | LAKE | AVE | |	County	Lake Avenue CR204?
0623011101073	6868 | | | LAKE | AVE | |	County	Lake Avenue CR204
0623011102025	6856 | | | LAKE | AVE |	County	Lake Avenue CR204
0623014000010	41436 | | | GRISWOLD | RD | |	Elyria	Griswold Rd TR
0624036104049	7444 | | | LAKE | AVE | |	County	Lake Avenue CR204?
0624037104033	7284 | | | LAKE | AVE | |	County	Lake Avenue CR204?
0624038101023	6968 | | | LAKE | AVE | |	County	Lake Avenue CR204
0624038103004	41713 | | | GRISWOLD | RD | |	Elyria	Griswold Rd TR
0624038103007	41625 | | | GRISWOLD | RD | |	unknown	unknown/railway ditch?
1000003124022	635 | | | OBERLIN | RD |	County	Hall Rd CR199
1000003124028	617 | | | OBERLIN ELYRIA | RD | |	County	Hall RD CR199
1000003124030	613 | | | OBERLIN ELYRIA | RD | |	County	Hall RD CR199
1000003124034	675 | | | OBERLIN ELYRIA | RD | |	County	Oberlin-Elyria Rd CR231
1000003124035	701 | | | OBERLIN ELYRIA | RD | |	County	Oberlin-Elyria Rd CR231
1000003124039	639 | | | OBERLIN ELYRIA | RD | |	County	Oberlin-Elyria Rd CR231
1000003125011	705 | | | OBERLIN ELYRIA | RD | |	County	Oberlin-Elyria Rd CR231
1000003129003	602 | | | OBERLIN ELYRIA | RD | |	County	check discharge pt cord

PIN	Stan_addr	Dischg_MS4	Dischg_To
1000003131009	618 | | | OBERLIN ELYRIA | RD | |	County	unknown
1000003131057	674 | | | OBERLIN ELYRIA | RD | |	County	Oberlin-Elyria Rd CR231
1000003131059	672 | | | OBERLIN ELYRIA | RD | |	County	Oberlin-Elyria Rd CR231
1000004120018	1425 | | | EAST | AVE | |	County	Fuller Rd CR174 or CR205
1000004139003	9685 | | | EAST RIVER | RD |	County	East River Road CR34
1000004139007	9715 | | | EAST RIVER | RD |	County	East River Road CR34
1000006109003	2023 | | | GRAFTON | RD | |	County	Grafton Rd CR205
1000006110037	2020 | | | GRAFTON | RD | |	County	Grafton Rd CR205
1000008102005	41304 | | | OBERLIN ELYRIA | RD | |	County	Russia Rd CR57
1000008111004	780 | | | OBERLIN ELYRIA | RD | |	County	Oberlin-Elyria Rd
1000009116023	41790 | | | OBERLIN ELYRIA | RD | |	County	Oberlin-Elyria Rd CR231
1000013000107	40980 | | | BUTTERNUT RIDGE | RD | |	County	Buttenut Ridge Rd CR12
1100089000118	37550 | | | BUTTERNUT RIDGE | RD | |	unknown	Unknown. SR10?
1200021105001	24393 | | | SPRAGUE | RD | |	County	Sprague Road CR10
1200098000069	11388 | | | ROOT | RD | |	County	Root Rd CR24

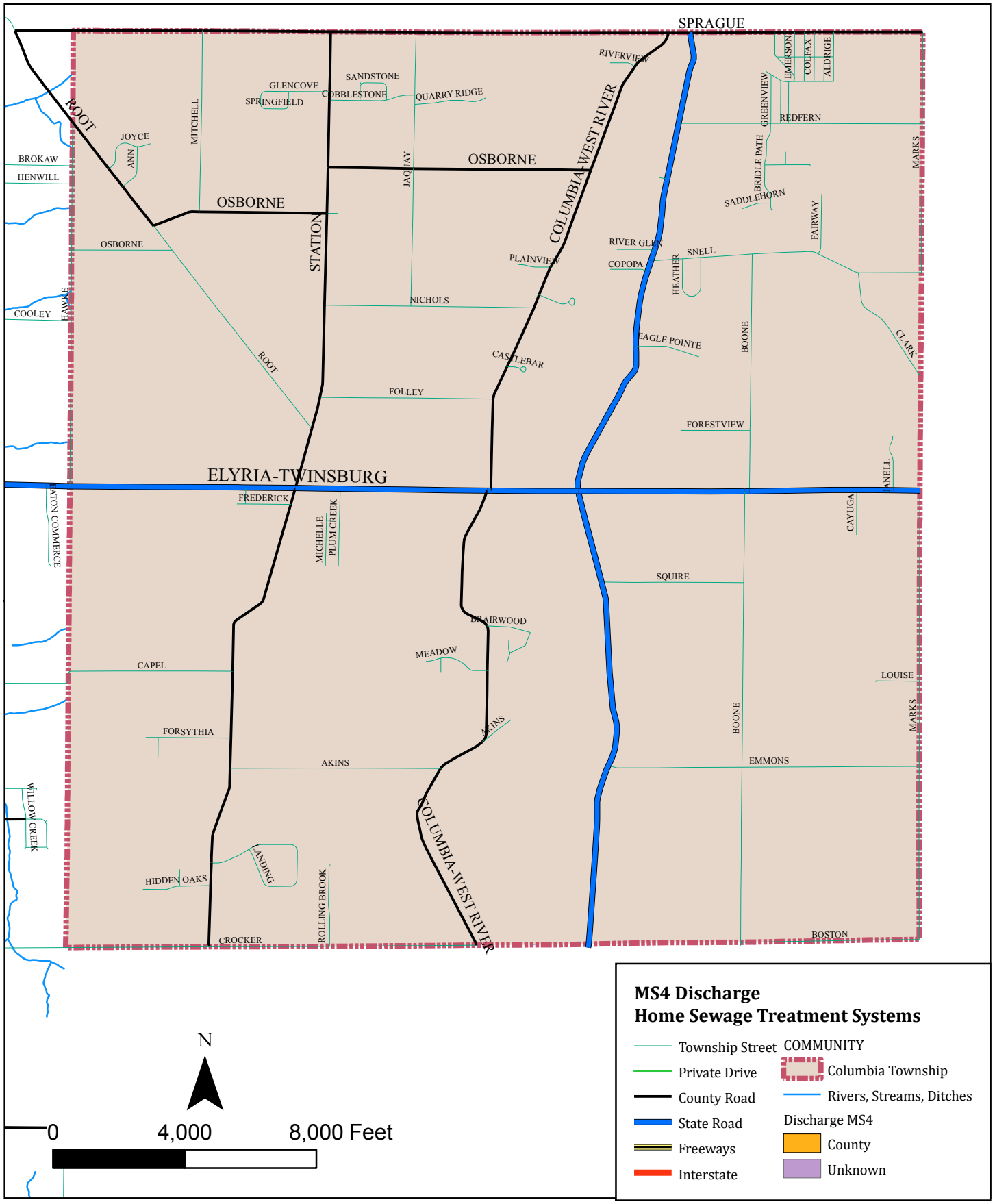
Amherst Township, Ohio
Home Sewage Treatment System
Offsite MS4 Discharge



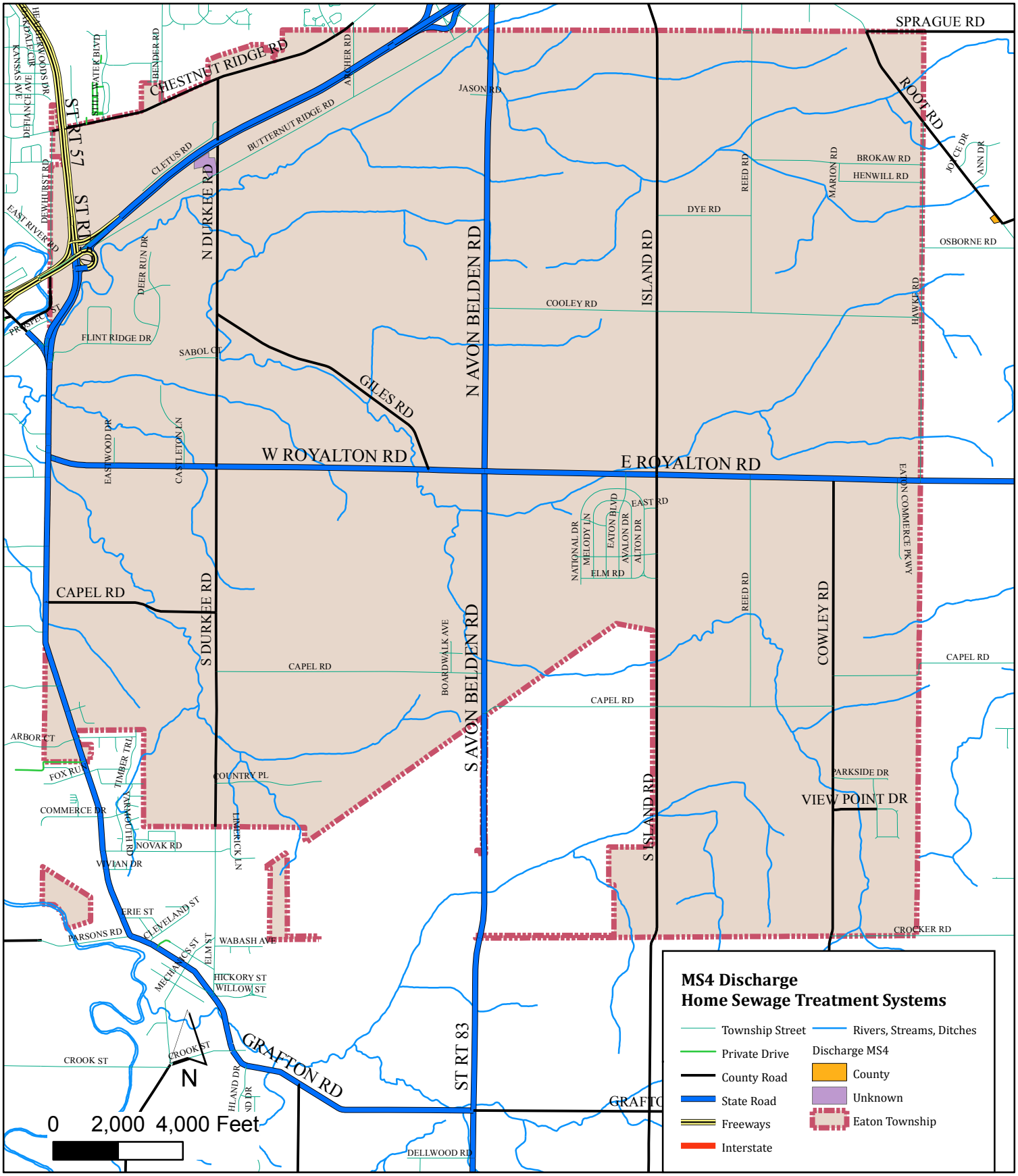
Carlisle Township, Ohio
Home Sewage Treatment System
Offsite MS4 Discharge



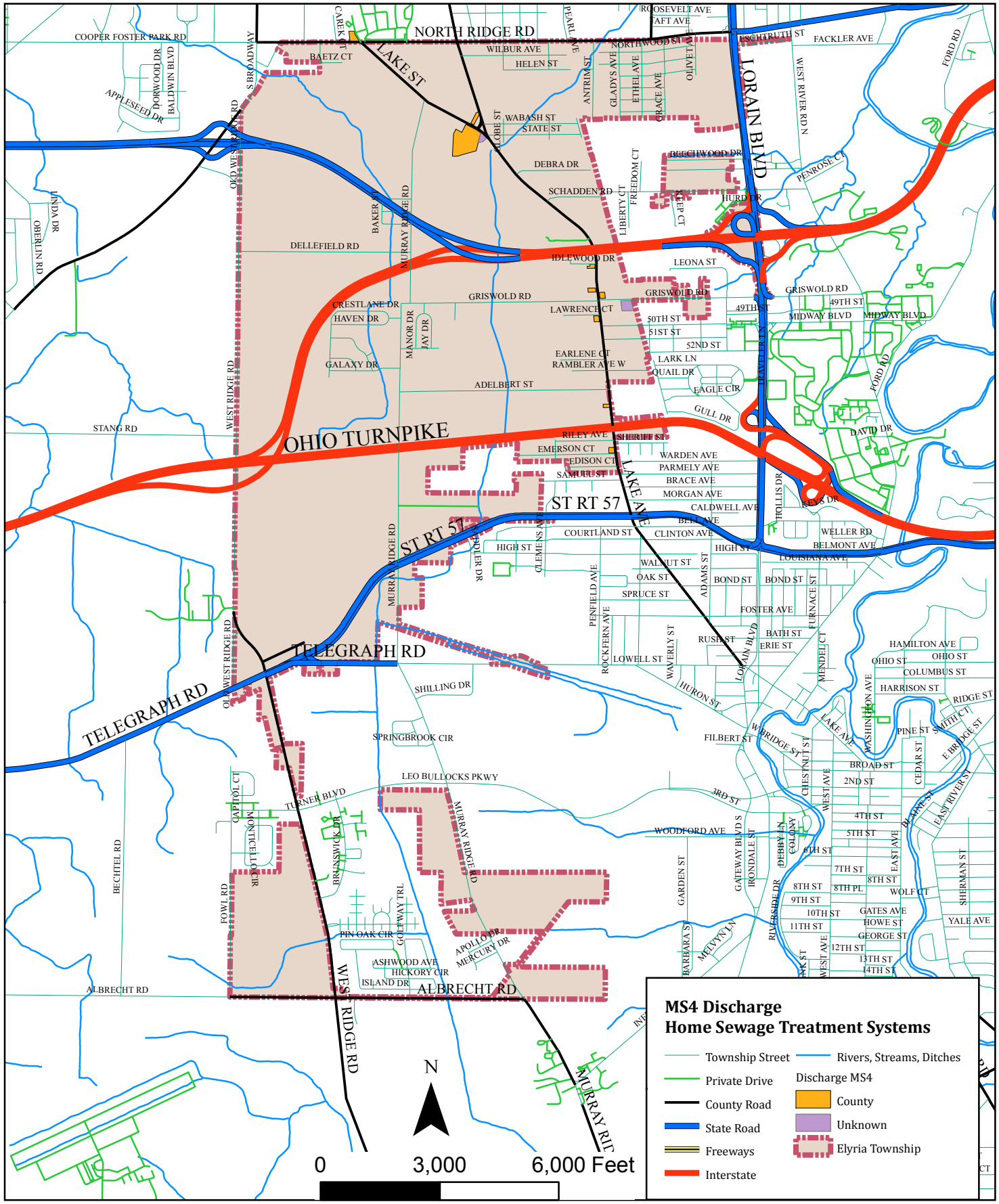
Columbia Township, Ohio
Home Sewage Treatment System
Offsite MS4 Discharge



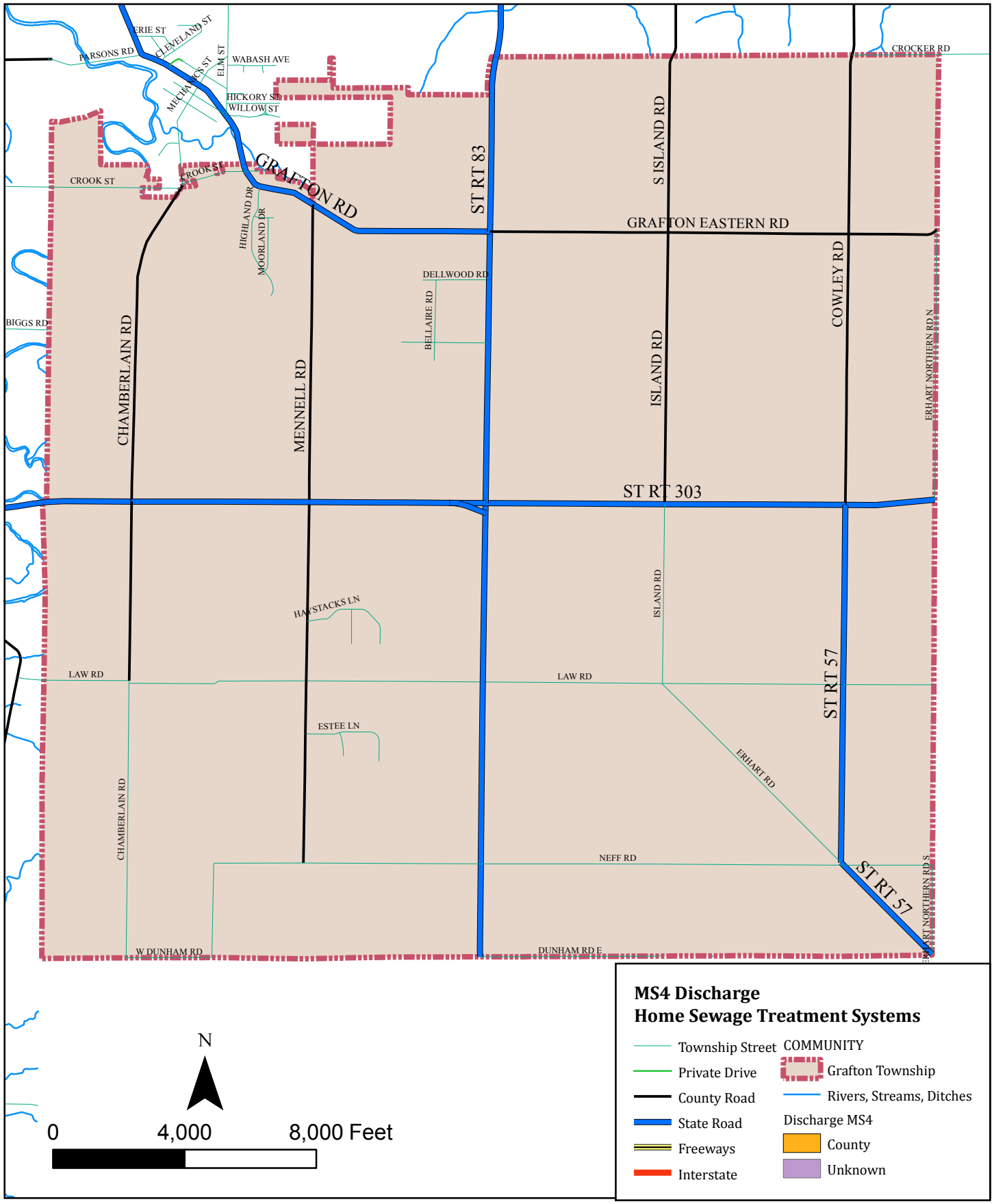
Eaton Township, Ohio
Home Sewage Treatment System
Offsite MS4 Discharge



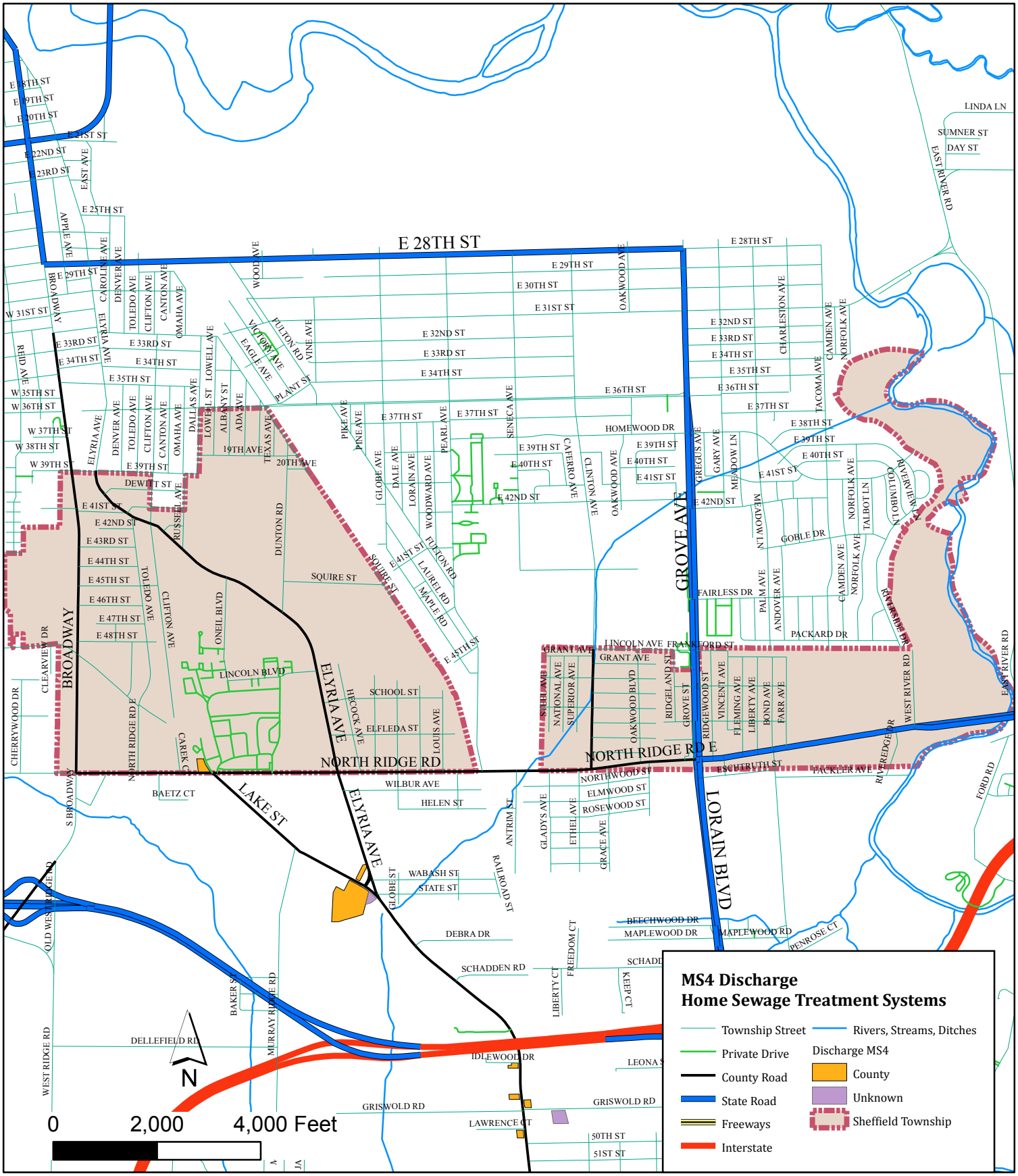
Elyria Township, Ohio
Home Sewage Treatment System
Offsite MS4 Discharge



Grafton Township, Ohio
Home Sewage Treatment System
Offsite MS4 Discharge



Sheffield Township, Ohio
Home Sewage Treatment System
Offsite MS4 Discharge



NORTH

SCALE: "1=500'

CORPORATION LINE

CORPORATION LINE

CORPORATION LINE

CORPORATION LINE

CORPORATION LINE

MAPLE ST.

STERN ST.

HILLCREST DR.

HAMILTON STREET

KIPTON N.P.

STATE ROUTE 58

U.S. 20

STS LEGEND

SEPTIC SYSTEM	CREEK/ DITCH
6" STS MAIN	POND/ RESERVOIR/DETENTION BASIN
8" STS MAIN	2" STS OUTLET
10" STS MAIN	4" STS OUTLET
12" STS MAIN	6" STS OUTLET
15" STS MAIN	8" STS OUTLET
18" STS MAIN	9" STS OUTLET
20" STS MAIN	10" STS OUTLET
21" STS MAIN	12" STS OUTLET
24" STS MAIN	14" STS OUTLET
27" STS MAIN	15" STS OUTLET
30" STS MAIN	18" STS OUTLET
36" STS MAIN	20" STS OUTLET
48" STS MAIN	24" STS OUTLET
54" STS MAIN	28" STS OUTLET
60" STS MAIN	48" STS OUTLET
	54" STS OUTLET

CITY OF OBERLIN. OHIO

Exhibit 6 – MS4 Map

A copy of the updated Comprehensive Storm Sewer Map is available to the public via the Stormwater Management District Website.

https://stormwater.loraincounty.us/map

NORTH

SCALE: "1=500'

CORPORATION LINE

CORPORATION LINE

CORPORATION LINE

CORPORATION LINE

CORPORATION LINE

MAPLE ST.

STERN ST.

HILLCREST DR.

HAMILTON STREET

KIPTON N.P.

STATE ROUTE 58

U.S. 20

STS LEGEND

SEPTIC SYSTEM	CREEK/ DITCH
6" STS MAIN	POND/ RESERVOIR/DETENTION BASIN
8" STS MAIN	2" STS OUTLET
10" STS MAIN	4" STS OUTLET
12" STS MAIN	6" STS OUTLET
15" STS MAIN	8" STS OUTLET
18" STS MAIN	9" STS OUTLET
20" STS MAIN	10" STS OUTLET
21" STS MAIN	12" STS OUTLET
24" STS MAIN	14" STS OUTLET
27" STS MAIN	15" STS OUTLET
30" STS MAIN	18" STS OUTLET
36" STS MAIN	20" STS OUTLET
48" STS MAIN	24" STS OUTLET
54" STS MAIN	28" STS OUTLET
60" STS MAIN	48" STS OUTLET
	54" STS OUTLET

CITY OF OBERLIN. OHIO

Exhibit 7 – Site Specific Storm Water Pollution Prevention Plans

Stormwater Pollution Prevention Plan

for:

Elyria Township Maintenance Facility
41416 Griswold Road
Elyria, OH 44035
440-324-3517

SWPPP Contact(s):

Road Department Superintendent
Tim Van Dyke
41416 Griswold Road
Elyria, OH 44035
440-324-3517

SWPPP Preparation Date:

05/ 2013

Rev. 4/13/16

Rev. 7/27/21

Rev. 11/9/2021

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SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Elyria Township Maintenance Facility

Street: 41416 Griswold Road

City: Elyria State: OH ZIP Code: 44035

County: Lorain

MS4 Permit Number: 3GQ10012*DG Facility Permit Number: N/A

MS4 Permittee Name: Lorain County Storm Water Management District

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude: Longitude:

1. 41 º 24 ' 03.27" N (degrees, minutes, seconds) 1. 82 º 07 ' 25.46" W (degrees, minutes, seconds)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS

☒ Other (please specify): Google Earth

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 1.1 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☒ Yes ☐ No

If yes, name of MS4 operator: Lorain County

Name(s) of water(s) that receive stormwater from your facility Lorain County MS4 then to the Black River

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No

If Yes, identify name of the impaired water (and segment, if applicable): _____

Identify the pollutant(s) causing the impairment: _____

For pollutants identified, which do you have reason to believe will be present in your discharge? _____

_____

For pollutants identified, which have a completed TMDL? _____

Use the table below or refer to Appendix D in Permit OHR000006 to answer the following;

Description of Municipal Activities at this Facility: Maintenance Garage / Service Yard

Subsector(s) (choose all that apply): P1

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Composting	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

*If the transfer station is located at the landfill where the waste will be disposed, use Subsector L1.

1.2 Contact Information/Responsible Parties

Facility Operator (s):

Name: Elyria Township Maintenance Facility
Address: 41416 Griswold Road
City, State, Zip Code: Elyria, OH 44035
Telephone Number: 440-324-3517
Email address:
Fax number: None

Facility Owner (s):

Name: Elyria Township
Address: 41416 Griswold Road
City, State, Zip Code: Elyria, OH 44035
Telephone Number: 440-324-3517
Email address:
Fax number: 440-329-5587

SWPPP Contact:

Name: Tim Van Dyke
Telephone number: 440-324-3517
Email address:
Fax number: None

1.3 Stormwater Pollution Prevention Team

Staff Names	Individual Responsibilities
Tim Van Dyke	Road Department Superintendent

1.4 Activities at the Facility

The Elyria Township Maintenance Facility consists of a maintenance building, a covered salt storage shed, a storage building, and outdoor storage locations. The site is also the location for the Elyria Township Fire Department.

All of the industrial activities listed in section 2.1 take place in the maintenance building except for temporary stone, gravel, sand, etc. stockpiling, and salt stockpiling. Salt stockpiling occurs in the covered salt storage shed. Temporary stone, gravel, sand, etc. stockpiling, as well as some material storage, takes place in the outdoor storage areas. The storage building on site is primarily used for the storage of flammable items.

1.5 General Location Map

A copy of the general location map for this facility is located in Attachment A.

1.6 Site Map

A copy of the site map for this facility is located in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Equipment and Vehicle Storage	Fuel, antifreeze, oils
Equipment and Vehicle Maintenance	Fuel, antifreeze, oils
Equipment and Vehicle Wash	Fuel, antifreeze, oils, sediment, detergents
Temporary Stone, Gravel, Sand, etc. Stockpiling	Sediment
Salt Stockpiling	Salt
Materials Storage	Sediment and material particles
Used Oil Storage	Oils

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Salt Storage Shed	Outfall # 1
Stockpile Areas	Outfall #1 & #2
Maintenance Areas	Sanitary Sewer
Vehicle Washing Area	Sanitary Sewer
Used Oil Storage Container	Sanitary Sewer
Vehicle and Equipment Storage Areas	Sanitary Sewer

Description of Past Spills/Leaks

Date	Description	Outfalls
	No Information	

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation: 5/2/16
- Description of the evaluation criteria used: Routine Facility Inspection Report
- List of the outfalls or onsite drainage points that were directly observed during the evaluation: Outfall #1 and Outfall #2 (Shown on Site Map – Attachment B)
- Different types of non-stormwater discharge(s) and source locations: No non-stormwater discharges were observed. This is to be continually monitored.

  The following are acceptable non-storm water discharges (illicit discharges) only if they are not "significant contributors of pollutants to the MS4":

  - Water line flushing
  - Landscaping irrigation
  - Irrigation water
  - Diverted stream flows
  - Springs
  - Rising ground waters
  - Uncontaminated ground water infiltration
  - Uncontaminated pumped ground water
  - Flows from riparian habitats and wetlands
  - Discharges from potable water sources
  - Water from crawl space pumps
  - Foundation drains
  - Air conditioning condensation
  - Footing drains
  - Lawn watering
  - Individual residential car washing
  - Dechlorinated swimming pool discharges
  - Street wash water
  - Discharges or flows from fire fighting activities

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. *For example, a catch basin was re-routed to sanitary for provide an area to dewater catch basin cleanings, the discharge of leachate from composting is being collected and*

sprayed back onto the piles, or an NPDES permit application was submitted for an unauthorized illicit discharge: N/A – No unauthorized discharges were observed.

2.4 Salt Storage

There is a covered salt storage shed with walls on three sides and an asphalt floor.

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the extent practical. Following is a list of special structural controls or practices that are implemented to minimized the exposure to rain, snow, snowmelt and runoff specific to the Elyria Township Maintenance Facility:

- The salt stockpile is stored in a covered salt storage shed with an asphalt floor, to help prevent polluted rainwater runoff from the salt stockpile and also infiltration to the ground water.
- Stockpiles on site and any temporary storage that is kept on a paved surface that drains to catch basins with sumps to remove sediment and pollutants, before discharging to the storm sewer system.
- Any stockpiles that are not located on paved surfaces are to have silt fence around them to prevent sediment from leaving the site.
- Vehicle and equipment maintenance is done inside the maintenance building with floor drains that are routed thru the oil/water separator and then discharge the sanitary sewer.
- Vehicles and equipment are stored under cover and on concrete pavement to control the potential of pollution, from spills and leaks.
- The used oil storage container is located in the maintenance building to protect against the possibility of pollution from a spill or leak.
- The vehicles and equipment are washed inside the maintenance building where the drains go to the oil/separator which discharges to the sanitary sewer.
- All trash is collected in covered dumpsters and picked up on a regular basis.
- A building was built to store all flammable materials.

Figure 1 – Drain Inside Maintenance Building which drains to Oil/Water Separator

Figure 2 – Spill Kit

Figure 3 – Salt Storage Shed

Figure 4 – Catch Basin and Dumpster

3.2 Good Housekeeping

The intent of Good Housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which helps to reduce the potential of pollution of storm water. The following prevention measures shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights so as to be easily accessed.
- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation.
- Make sure items are stored away from areas where the chance of an accident to occur is greater.
- Refill materials in secondary containments or indoors.
- Look to install leak detection devices, overflow controls and diversion berms.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or non toxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up drips and spills promptly.

- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.

Waste material shall be picked up on a regular schedule, set by the County or additional picks ups when needed. Storage containers shall be inspected, yearly at a minimum, along with equipment and vehicles being used regularly. Stored vehicles and equipment shall be continuously inspected for leaks.

3.3 Maintenance

It is important to properly inspect and maintain equipment, vehicles and systems, including green areas, storm sewer, sanitary system, and oil/water separator, grinder pump associated with the Elyria Township Maintenance Facility to detect potential issues that may cause pollutants to storm water. Green areas shall be mowed and cleaned of debris. The storm sewer system and catch basins with sumps shall cleaned yearly or after major storm events. The oil/water separator shall be inspected yearly and cleaned, to ensure that it works properly. The grinder pump and force main shall be inspected yearly as well.

3.4 Spill Prevention and Response

When a spill does occur, quick and effective response will prevent pollutants from reaching storm water. Spills will be cleaned up promptly and not allowed to evaporate so that pollutants do not remain on the pavement to be washed to the storm drains with the next rain or remain in the soil to become a possible groundwater pollutant. If the spill is on an unpaved surface, determine whether the contaminated soil should be removed to prevent it from being a source of future storm water pollutants. Spill procedures will also include cleaning up leaks, drips, and other spills without water whenever possible. It is important to make sure that all the material is picked up and that the cleanup waste is properly disposed of and stored until removed.

Spill prevention and response procedures for hazardous materials stored or handled onsite will follow the procedures described in the facility Hazardous Materials Management Plan. Responsible personnel will contain and collect the spilled substance, then dispose of the substances and any contaminated soil in compliance with local hazardous materials regulations.

With any spill it is important to determine the scope of spill and follow the appropriate procedure outlined below. Non Hazardous spills can be categorized as small spills, medium spills and large spills.

- Small spills**:** These are spills that can be wiped up with a shop rag. Wet rags will not be put in the dumpster with the shop trash. They will be stored in a covered bin like the kind used at auto service stations. Used rags will be sent to a professional cleaning service or disposed of with the hazardous wastes if necessary.

- Medium-sized spills**:** These are spills too large to wipe up with a rag. Medium sized spills will be contained and soaked up using dry absorbent material such as: Vermiculite, specially-prepared sawdust, or kitty litter. Absorbent snakes may be used as temporary brooms to contain and soak up the liquid. Used absorbent material will be swept up or collected and will be disposed of with the

shop trash if non-hazardous or with the hazardous wastes if necessary. A wet/dry shop vacuum cleaner may also be used to collect spills and dispose of the liquid with hazardous wastes. Vacuums will not be used for gasoline, solvents, or other volatile fluids, because the enclosed vacuum may become an explosive hazard.

- Large spills**:** Spills of non-hazardous liquids will be contained and cleaned using a minimum amount of wash water. Storm drain inlets or sewer inlets will be plugged to prevent the spill from entering the MS4. Temporary plugs will be kept onsite for the facility inlets and employees will be trained in when and how to use them.

- Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, 40 CFR Part 302, occurs during a 24-hour period, you shall notify the Ohio EPA Division of Emergency and Remedial Response at (800)282-9378 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. Contact information shall be in locations that are readily accessible and available.

A Spill/Release Incident Reporting form should be filled out promptly after a spill or release, and kept for OEPA auditing.

It is important that every employee is aware of the spill prevention, control and cleanup procedures. Training sessions for the employees along with mock spill response sessions should be conducted on an annual basis to prepare employees for real spills. There shall be spill response kits in all buildings and outdoors near fueling or loading stations. The spill response kit should contain:

- Absorbents
- Broom/dust pan
- Shovel
- Berms/socks
- Paper or cloth towels
- Safety goggles and gloves
- Phone numbers for appropriate cleanup authorities

The spill kits must be replenished soon after usage and checked at regular intervals. There will also be "Spill Response Procedures" posters posted around the facility.

3.5 Erosion and Sediment Controls

The erosion and sediment controls are implemented stabilization measures. The site is fairly flat, so there are no steep slopes. All roads/drives, material storage and staging areas and parking lots are concrete to control erosion and potential offsite discharges of sediment. The storm sewer runoff is collected in a storm sewer system with catch basins that have sumps in them. All disturbed areas are seeded and mulched per MS4 criteria. Fabric filter fence is added when needed.

3.6 Management of Runoff

The site is designed to help manage runoff by collecting the runoff in catch basins with sumps. Minimum amounts of impervious surfaces have been constructed, which helps control the increase of discharge from the site.

Natural vegetation has been left where ever possible

3.7 Salt Storage Piles or Piles Containing Salt

The salt stockpile is in a covered salt storage shed to prevent the discharge of storm water from the stockpile.

3.8 MSGP Sector-Specific Non-Numeric Effluent Limits

N/A – This site (sector P) has no non-numeric effluent limits

3.9 Employee Training

Successful storm water pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the Elyria Township Maintenance Facility. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm drains, because the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain so that they understand the importance of preventing storm water pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel.
- New personnel will be required to review and understand this document prior to initiating work activities.
- Retraining will be completed, if violations continue to occur.
- Information material shall be displayed to remind workers of BMPs practices.
- Contractors working for the municipality at the facility shall be required to complete Pollution Protection training.

3.10 Non-Stormwater Discharges

The MS4 Permit prohibits discharges of anything but storm water to the MS4. Field Inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm drain are prohibited, including storm drain connections from indoor drains or sinks. These are known as illicit connections and must be eliminated.

Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm drains, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures to help prevent non-storm water discharges will be implemented:

1. Provide well marked proper disposal or collection methods for solid or liquid waste.
2. Train employees in proper disposal of non-storm water discharges. Employees will be educated to understand that storm drains connect directly to waterways without treatment.
3. Label all storm drain inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm drain system.
4. Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-storm water discharges.
5. Periodically inspect and maintain storm drain inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm systems.
6. Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.
7. Check for possible pollutants at the storm water outfall locations and identify the pollutant to correct the situation.

3.11 Waste, Garbage and Floatable Debris

Solid waste dumpster and garbage receptacles have been placed around the site and in the sheds and building for the collection of garbage. The lids must be kept closed on the outside receptacles. Employees are encouraged to keep the areas they are working in, clean and waste/garbage free. Debris on the site will be picked up along with catch basin and storm sewer systems cleaned out on a regular bases.

The collected waste, garbage and debris will be removed and disposed of at approved locations.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

The site is in an urban setting. The drives and material storage and staging are covered with materials that control dust generation and also eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

For the routine facility inspections and the comprehensive site inspections to be performed at your site, include a description of the following:

- The names of the person(s), or the positions of the person(s), responsible for inspection: The Road Department Superintendent for Elyria Township.

- The schedules to be used for conducting inspections. Routine Facility Inspections are to be conducted quarterly, unless otherwise specified in Part 8 sector-specific requirements, and comprehensive site inspections are to be conducted annually: Routine facility inspections shall be performed once per calendar quarter, and comprehensive site inspections shall be performed once yearly. The comprehensive site inspection may be used for one of the routine inspections and

- Specific areas of the facility to be inspected, including schedules for specific outfalls:
  Routine facility inspections shall include inspection of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. outdoor storage, salt storage shed, storage building, vehicles), and of all storm water control measures used on site (i.e. catch basins, oil/water separator, grinder pump).

  Comprehensive site inspections shall consist of an inspection of the entire site including all areas reviewed for routine facility inspections, areas where spills and leaks have occurred in the past three years, and a review of monitoring data collected by the quarterly visual assessments. Inspectors shall also examine the following:

  - Industrial materials, residue, or trash that may have or could come into contact with storm water
  - Leaks or spills from industrial equipment, drums, tanks, and other containers
  - Offsite tracking of industrial or waste material, or sediment where vehicles enter or exit the site
  - Tracking or blowing of materials (including waste) from areas of no exposure to exposed areas
  - Storm water control measures needing replacement, maintenance, or repair

  Storm water controls measures shall be observed to ensure they are functioning correctly. If discharge locations are inaccessible, nearby downstream locations shall be inspected.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Kevin Burns Title: Asst Road Supt

Signature: Date: 2-25-22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS

Date of Revision	Section	Description
7/27/2021	1.1	LCSD MS4 permit number added.
7/27/2021	1.1	Subsector code table updated for composting due to a permit change
7/27/2021	1.1	Added Lorain County MS4 then to Black River as the receiving water.
11/8/2021	4.0	Visual inspection requirement removed.

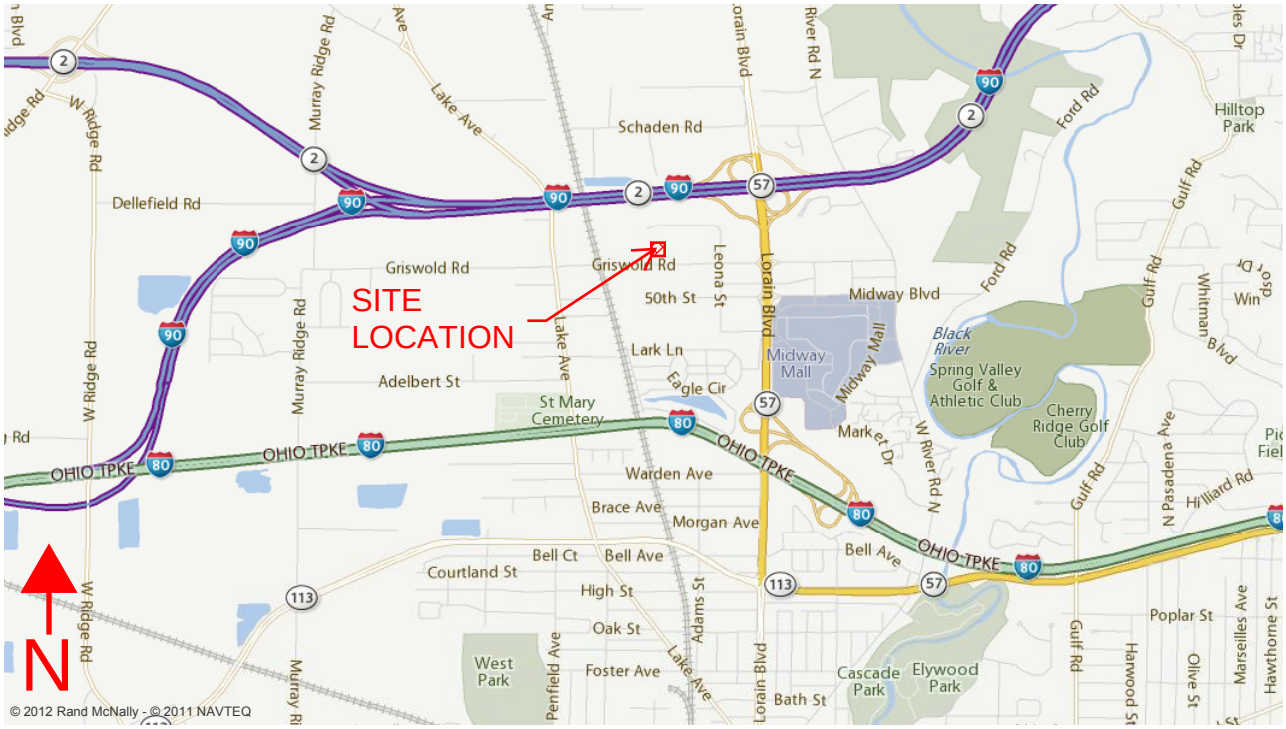
SWPPP ATTACHMENTS

Attachment A – General Location Map

Attachment B – Site Map

Attachment C – Ohio EPA NPDES Permit #OHR000006

Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)



ELYRIA TOWNSHIP
MAINTENANCE FACILITY

ATTACHMENT "A" GENERAL LOCATION MAP

DRAFTED BY: K.E. MCCARTNEY & ASSOCIATES INC., JOB TITLE: SM-125 SHEET NAME: ELYRIA TWP MAINT GARAGE GRISWOLD RD - 2016.dwg SCALE: 1 = 15 DATE: 3/1/16

K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

0 7.5 15 30
HORIZONTAL SCALE IN FEET

SITE PLAN - ELYRIA TOWNSHIP MAINTENANCE GARAGE
41416 GRISWOLD ROAD, ELYRIA, OH 44035

ATTACHMENT B

1
1

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

NPDES Permit Tracking No.:
N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Elyria Township Maint. Facility

2. NPDES Permit Tracking No.: N/A

3. Facility Physical Address:

a. Street: 41416 Griswold Rd

b. City: Elyria c. State: OH d. Zip Code: 44035-

4. Lead Inspectors Name: Title:

Additional Inspectors Name(s):

5. Contact Person: Title:

Phone: - - Ext. E-mail:

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
N/A

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:

N/A

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

N	/	A							

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
N/A

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ___ of ___ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: __/__/____

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: __/__/____

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
N/A

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Title:

Signature: Date Signed:

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Maintenance Form

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Routine Facility Inspection Report for MS4 Service Department

General Information			
Facility Name and MS4 Operator	Elyria Township Maintenance Facility		
NPDES Permit No.	OHR000005		
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information
Weather at time of this inspection? ❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds ❑ Other: Temperature:
Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No **If yes, describe:**
Are there any discharges occurring at the time of inspection? ❑Yes ❑No **If yes, describe:**

Structural Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Measures may include, but are not limited to, oil-water or hydrodynamic separators; storm water management ponds; bioretention areas; permeable pavement; cisterns; sand or other media filters; berms or curbs; covers such as tarps, roofs and lids; secondary containment structures; erosion and sediment controls, catch basin screens, sumps and inserts, spill kits, etc.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Oil/Water Separator	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	Catch Basin w/ Sump (CB#1)	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	Catch Basin w/ Sump (CB#2)	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	Catch Basin w/ Sump (CB#3)	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
5	Catch Basin w/ Sump (CB#4)	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6	Salt Storage Shed (Roof/Sides/Berm)	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7	Storage Building for Flammable Items	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
8	8" Outlet (North Side of Property)	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
9		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
10		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities Exposed to Storm Water

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	**Vehicle maintenance areas (mechanical repairs, body work, oil changes, etc.)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	**Vehicle washing area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	**Equipment cleaning (includes lawn mowers)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	**Outdoor vehicle and equipment storage/parking areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	**Fueling stations**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	**Salt and salt-containing material storage, loading and mixing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	**Snow disposal yard**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	**Storage yard for scrap, spare or unused materials and equipment**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
9	**Sand, dirt, ditch cleanings, mulch and aggregate storage piles**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	**Catch basin cleanings and street sweepings dewatering and solids management areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	**Yard waste storage and processing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	**Leaf collection area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
13	**Composting area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
14	**Pesticide, herbicide & fertilizer storage and application areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
15	**Hazardous waste collection area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
16	**Used oil storage drums and tanks**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
17	**Waste dumpsters**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
18	**Recycling area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
19	**Impound lot**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
20	**Dust generation and off-site vehicle tracking**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
21	**Indicators of illicit discharge**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Stormwater Pollution Prevention Plan

for:

Lorain County Highway Engineer Maintenance Facility
42100 Russia Road
Elyria, OH 44035

SWPPP Contact(s):

Lorain County Engineer
Ken Carney, P.E., P.S.
247 Hadaway Street
Elyria, OH 44035
440-329-5586 (phone)
440-329-5587 (fax)

SWPPP Preparation Date:

05/10/2013

Rev. 4/13/16

Rev. 7/26/21

Rev. 11/9/21

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SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Lorain County Highway Engineer Maintenance Facility

Street: 42100 Russia Road

City: Elyria State: OH ZIP Code: 44035

County: Lorain

MS4 Permit Number: 3GQ10012*DG Facility Permit Number: N/A

MS4 Permittee Name: N/A

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude: Longitude:

1. 42 º 20 ' 20.22" N (degrees, minutes, seconds) 1. 82 º 08 ' 21.69" W (degrees, minutes, seconds)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS

☒ Other (please specify): Google Earth

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 3.14 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☒ Yes ☐ No

If yes, name of MS4 operator: Lorain County

Name(s) of water(s) that receive stormwater from your facility: Straw Ditch

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No

If Yes, identify name of the impaired water (and segment, if applicable): _____

Identify the pollutant(s) causing the impairment: _____

For pollutants identified, which do you have reason to believe will be present in your discharge? _____

_____

For pollutants identified, which have a completed TMDL? _____

Use the table below or refer to Appendix D in Permit OHR000006 to answer the following;

Description of Municipal Activities at this Facility: Maintenance Garage / Service Yard

Subsector(s) (choose all that apply): P1

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Compost Yard, Leaf Collection Yard	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

*If the transfer station is located at the landfill where the waste will be disposed, use Subsector L1.

1.2 Contact Information/Responsible Parties

Facility Operator (s):

Name: Lorain County Engineer
Address: 247 Hadaway Street
City, State, Zip Code: Elyria, OH 44035
Telephone Number: 440-329-5586
Email address: kcarney@loraincounty.us
Fax number: 440-329-5587

Facility Owner (s):

Name: Lorain County Engineer
Address: 247 Hadaway Street
City, State, Zip Code: Elyria, OH 44035
Telephone Number: 440-329-5586
Email address: kcarney@loraincounty.us
Fax number: 440-329-5587

SWPPP Contact:

Name: Ken Carney, P.E., P.S.
Telephone number: 440-329-5586
Email address: kcarney@loraincounty.us
Fax number: 440-329-5587

1.3 Stormwater Pollution Prevention Team

Staff Names	Individual Responsibilities
Ken Carney, P.E., P.S.	County Engineer - General Oversight
Neil Dunfee	Safety Officer - Oversees day to day operations at the site

1.4 Activities at the Facility

The Lorain County Highway Engineer Maintenance Russia Road Facility serves as a storage and maintenance facility for municipal activities that are performed throughout the County. The site is made up of a main building which has a garage and offices within it, a salt storage building, a paint and sign shed, and a garage used for vehicle and equipment storage. There is also a fueling station on site, a bomb and arsenal detonator pit, and several outdoor storage locations.

The table on the next page shows which industrial activities take place on site and in which location:

Building / Site Location	Industrial Activities
Main Building	Equipment and Vehicle Storage, Maintenance and Wash, Used Oil Storage, and Material Storage
Paint and Sign Shed	Paint Barrel Storage, Sign Repair
Garage	Equipment and Vehicle Storage, Maintenance, and Wash
Salt and Material Storage Building	Salt Stockpiling
Bomb and Arsenal Detonator Pit	Bomb and Arsenal Detonation
Fueling Station	Equipment and Vehicle Fueling
Outdoor Storage (multiple locations throughout site)	Stone, Gravel, Sand, etc. Stockpiling, Material Storage, Top Soil Stockpiling, Construction and Demolition Debris Storage, Vehicle Storage

1.5 General Location Map

A copy of the general location map for this facility is located in Attachment A.

1.6 Site Map

A copy of the site map for this facility is located in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Paint Barrel Storage	Paint
Sign Repair	Paint, solvents, and material particles
Equipment and Vehicle Storage	Fuel, antifreeze, oils
Equipment and Vehicle Maintenance	Fuel, antifreeze, oils
Equipment and Vehicle Wash	Fuel, antifreeze, oils, sediment, detergents
Equipment and Vehicle Fueling	Fuel
Top Soil Stockpiling	Sediment
Stone, Gravel, Sand, etc. Stockpiling	Sediment
Salt Stockpiling	Salt
Materials Storage	Sediment and material particles
Bomb and Arsenal Detonation	Hazardous substances and material particles
Construction and Demolition Debris Storage	Sediment and material particles
Used Oil Storage	Oils

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Paint Barrel Storage Area	Outfall #5 or Outfall #1
Salt Storage Shed	Outfall #5
Stockpile Areas	Outfall #'s 1, 2, 3, 4, 5
Maintenance Areas	Outfall #4 and Oil/Water Separator
Fueling Area	Outfall #5
Vehicle Washing Area	Oil/Water Separator
Used Oil Storage Container	Outfall #4
Vehicle and Equipment Storage Areas	Outfall #4 and Oil/Water Separator
Bomb and Arsenal Detonator Pit	Outfall #1

Description of Past Spills/Leaks

Date	Description	Outfalls
	No Information	

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation: 5/2/16
- Description of the evaluation criteria used: Routine Facility Inspection Report
- List of the outfalls or onsite drainage points that were directly observed during the evaluation: Outfall # 1, Outfall # 2, Outfall #3, Outfall #4, Outfall #5, Outfall #5
- Different types of non-stormwater discharge(s) and source locations: All allowable non-storm water discharges must be documented to meet administrative requirements. There are currently no non-storm water discharges at this site.

  The following are acceptable non-storm water discharges (illicit discharges) only if they are not "significant contributors of pollutants to the MS4":

  - Water line flushing
  - Landscaping irrigation
  - Irrigation water
  - Diverted stream flows
  - Springs
  - Rising ground waters
  - Uncontaminated ground water infiltration

- Uncontaminated pumped ground water
- Flows from riparian habitats and wetlands
- Discharges from potable water sources
- Water from crawl space pumps
- Foundation drains
- Air conditioning condensation
- Footing drains
- Lawn watering
- Individual residential car washing
- Dechlorinated swimming pool discharges
- Street wash water
- Discharges or flows from fire fighting activities

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. *For example, a catch basin was re-routed to sanitary for provide an area to dewater catch basin cleanings, the discharge of leachate from composting is being collected and sprayed back onto the piles, or an NPDES permit application was submitted for an unauthorized illicit discharge:* No unauthorized non-stormwater discharges were documented from the site.

2.4 Salt Storage

There is a covered salt storage shed with walls on three sides. A berm has been constructed along the open end of the shed to control any possible polluted runoff from discharging into the surface waters.

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the extent practical. Following is a list of special structural controls or practices that are implemented to minimized the exposure to rain, snow, snowmelt and runoff specific to the Russia Road facility:

- The salt stockpile is stored in a covered salt storage shed with a 2' high berm, on the open end, to contain any storm water runoff from the area.
- The Bomb and Arsenal Detonation Pit is enclosed in concrete on the sides, and the area is graded so that the runoff does not flow away from the area.
- The construction and demolition debris, topsoil soil, stone, gravel, sand, etc. stockpiles and material storage areas are located so that the storm water runoff from them will pass over

a green belt strip and then discharge into vegetated swales to remove sediment and pollutants, before discharging from the site.

- The paint barrels are stored on a concrete slab under cover to protect in case of a spill.
- The sign shed storage area is covered to eliminate storm water runoff from being polluted from this activity.
- The fueling station is located on concrete pavement to protect in case of a spill. A spill kit is also located on site at the pumps.
- Vehicle and equipment maintenance is done inside the main building in a bay that has a drain to contain any spills and routed thru the oil/water separator.
- Vehicles and equipment are stored under cover and on concrete pavement to control the potential of pollution, from spills and leaks. The areas are also graded so that any runoff from inside the Maintenance Building will drain to catch basins that are routed thru the oil/water separator.
- The used oil storage container is located outside on asphalt to protect against the possibility of pollution from a spill or leak.
- The vehicle wash is located outside in a low area so that water does not get to the storm water system, and infiltrates the ground.
- Uncovered outside storage areas are graded so that the runoff passes over a green belt strip and then drains into vegetated swales before discharging into Straw Haag Ditch.
- Green belt strips and vegetated swales are used around and throughout the entire site to control sediment and pollutants, discharging from the site.
- There is a storm water overflow basin located on the site to control the storm water quantity discharge from the site.

Figure 1 – Inside of Maintenance Garage

Figure 2 – Used Oil Container

Figure 3 – Outdoor Storage

Figure 4 – Fuel Station

3.2 Good Housekeeping

The intent of Good Housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which helps to reduce the potential of pollution of storm water. The following prevention measures shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights so as to be easily accessed.
- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation.
- Make sure items are stored away from areas where the chance of an accident to occur is greater.
- Refill materials in secondary containments or indoors.
- Look to install leak detection devices, overflow controls and diversion berms.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or non toxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up drips and spills promptly.
- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.

Waste material shall be picked up on a regular schedule, set by the County or additional picks ups when needed. Storage containers shall be inspected, yearly at a minimum, along with equipment and vehicles being used regularly. Stored vehicles and equipment shall be continuously inspected for leaks.

3.3 Maintenance

It is important to properly inspect and maintain equipment, vehicles and systems, including vegetated swales, green areas, storm sewer, sanitary system, and oil/water separator associated with the Lorain

County Highway Engineer Maintenance Facility on Russia Road to detect potential issues that may cause pollutants to storm water. Vegetated swales shall be cleaned of debris yearly or after major storm events. Green areas shall be mowed and cleaned of debris. The storm sewer system shall cleaned yearly or after major storm events. The oil/water separator shall be inspected yearly and cleaned, to ensure that it works properly. The septic system and sanitary lift station shall be inspected yearly as well.

3.4 Spill Prevention and Response

When a spill does occur, quick and effective response will prevent pollutants from reaching storm water. Spills will be cleaned up promptly and not allowed to evaporate so that pollutants do not remain on the pavement to be washed to the storm drains with the next rain or remain in the soil to become a possible groundwater pollutant. If the spill is on an unpaved surface, determine whether the contaminated soil should be removed to prevent it from being a source of future storm water pollutants. Spill procedures will also include cleaning up leaks, drips, and other spills without water whenever possible. It is important to make sure that all the material is picked up and that the cleanup waste is properly disposed of and stored until removed.

Spill prevention and response procedures for hazardous materials stored or handled onsite will follow the procedures described in the facility Hazardous Materials Management Plan. Responsible personnel will contain and collect the spilled substance, then dispose of the substances and any contaminated soil in compliance with local hazardous materials regulations.

With any spill it is important to determine the scope of spill and follow the appropriate procedure outlined below. Non Hazardous spills can be categorized as small spills, medium spills and large spills.

- Small spills**:** These are spills that can be wiped up with a shop rag. Wet rags will not be put in the dumpster with the shop trash. They will be stored in a covered bin like the kind used at auto service stations. Used rags will be sent to a professional cleaning service or disposed of with the hazardous wastes if necessary.

- Medium-sized spills**:** These are spills too large to wipe up with a rag. Medium sized spills will be contained and soaked up using dry absorbent material such as: Vermiculite, specially-prepared sawdust, or kitty litter. Absorbent snakes may be used as temporary brooms to contain and soak up the liquid. Used absorbent material will be swept up or collected and will be disposed of with the shop trash if non-hazardous or with the hazardous wastes if necessary. A wet/dry shop vacuum cleaner may also be used to collect spills and dispose of the liquid with hazardous wastes. Vacuums will not be used for gasoline, solvents, or other volatile fluids, because the enclosed vacuum may become an explosive hazard.

- Large spills**:** Spills of non-hazardous liquids will be contained and cleaned using a minimum amount of wash water. Storm drain inlets or sewer inlets will be plugged to prevent the spill from entering the MS4. Temporary plugs will be kept onsite for the facility inlets and employees will be trained in when and how to use them.

- Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117,

40 CFR Part 302, occurs during a 24-hour period, you shall notify the Ohio EPA Division of Emergency and Remedial Response at (800)282-9378 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. Contact information shall be in locations that are readily accessible and available.

A Spill/Release Incident Reporting form should be filled out promptly after a spill or release, and kept for OEPA auditing.

It is important that every employee is aware of the spill prevention, control and cleanup procedures. Training sessions for the employees along with mock spill response sessions should be conducted on an annual basis to prepare employees for real spills. There shall be spill response kits in all buildings and outdoors near fueling or loading stations. The spill response kit should contain:

- Absorbents
- Broom/dust pan
- Shovel
- Berms/socks
- Paper or cloth towels
- Safety goggles and gloves
- Phone numbers for appropriate cleanup authorities

The spill kits must be replenished soon after usage and checked at regular intervals. There will also be "Spill Response Procedures" posters posted around the facility.

3.5 Erosion and Sediment Controls

The erosion and sediment controls are implemented stabilization measures, green belt strips, vegetated swales, and berms. The site is fairly flat, so there are no steep slopes. All roads/drives, material storage and staging areas and parking lots are either concrete, gravel or recycled grindings to control erosion and potential offsite discharges of sediment. All disturbed areas are seeded and mulched per MS4 criteria. Filter fabric is also used when needed.

Figure 5 – Inlet with Filter Fabric

Figure 6 – Vegetated Swale

3.6 Management of Runoff

The site is designed to help manage runoff by routing runoff over green belt strips with minimum slope and then collecting the runoff in vegetated swales to slow down the rate of discharge and allow for infiltration. Minimum amounts of impervious surfaces have been constructed, which helps control the increase of discharge from the site.

Natural vegetation has been left where ever possible. A storm water overflow basin has also been constructed on the site to manage runoff.

3.7 Salt Storage Piles or Piles Containing Salt

The salt pile is in a covered salt storage shed to prevent the discharge of storm water from the stockpile. A 2' high berm has also been placed along the open side of the shed to control any runoff from the stockpile.

Figure 7 – Salt Storage Shed

3.8 MSGP Sector-Specific Non-Numeric Effluent Limits

N/A – This site (sector P) has no non-numeric effluent limits

3.9 Employee Training

Successful storm water pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the Lorain County Russia Road Facility. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm drains, because the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain so that they understand the importance of preventing storm water pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel.
- New personnel will be required to review and understand this document prior to initiating work activities.
- Retraining will be completed, if violations continue to occur.
- Information material shall be displayed to remind workers of BMPs practices.
- Contractors working at the facility shall be required to complete Pollution Protection training.

3.10 Non-Stormwater Discharges

The MS4 Permit prohibits discharges of anything but storm water to the MS4. Field Inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm drain are prohibited, including storm drain connections from indoor drains or sinks. These are known as illicit connections and must be eliminated.

Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm drains, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures to help prevent non-storm water discharges will be implemented:

1. Provide well marked proper disposal or collection methods for solid or liquid waste.

2. Train employees in proper disposal of non-storm water discharges. Employees will be educated to understand that storm drains connect directly to waterways without treatment.

3. Label all storm drain inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm drain system.

4. Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-storm water discharges.

5. Periodically inspect and maintain storm drain inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm systems.

6. Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.

7. Check for possible pollutants at the storm water outfall locations and identify the pollutant to correct the situation.

3.11 Waste, Garbage and Floatable Debris

Solid waste dumpster and garbage receptacles have been placed around the site and in the sheds and building for the collection of garbage. The lids must be kept closed on the outside receptacles. Employees are encouraged to keep the areas they are working in, clean and waste/garbage free. Debris on the site will be picked up along with catch basin and storm sewer systems cleaned out on a regular bases.

The collected waste, garbage and debris will be removed and disposed of at approved locations.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

The site is in a rural setting. The drives and material storage and staging are covered with materials that control dust generation and also eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

For the routine facility inspections and the comprehensive site inspections to be performed at your site, include a description of the following:

- The names of the person(s), or the positions of the person(s), responsible for inspection: The facility manager or a Lorain County Engineer representative.

- The schedules to be used for conducting inspections. Routine Facility Inspections are to be conducted quarterly, unless otherwise specified in Part 8 sector-specific requirements, and comprehensive site inspections are to be conducted annually: Routine facility inspections shall be performed once per calendar quarter, and comprehensive site inspections shall be performed once yearly. The comprehensive site inspection may be used for one of the routine inspections and

- Specific areas of the facility to be inspected, including schedules for specific outfalls:
  Routine facility inspections shall include inspection of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. outdoor storage / stockpiles, salt storage shed, paint and sign shed, fueling station, vehicles, used oil containers), and of all storm water control measures used on site (i.e. catch basins, vegetated drainage swales, Outfall #'s 1 – 3, storm water overflow basin, Oil/water separator).

  Comprehensive site inspections shall consist of an inspection of the entire site including all areas reviewed for routine facility inspections, areas where spills and leaks have occurred in the past three years, onsite sanitary lift station and septic system, indoor maintenance, storage, and wash areas, and a review of monitoring data collected by the quarterly visual assessments. Inspectors shall also examine the following:

  - Industrial materials, residue, or trash that may have or could come into contact with storm water
  - Leaks or spills from industrial equipment, drums, tanks, and other containers
  - Offsite tracking of industrial or waste material, or sediment where vehicles enter or exit the site
  - Tracking or blowing of materials (including waste) from areas of no exposure to exposed areas
  - Storm water control measures needing replacement, maintenance, or repair

  Storm water controls measures shall be observed to ensure they are functioning correctly. If discharge locations are inaccessible, nearby downstream locations shall be inspected.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: James R. Boyles Title: Operator of Record

Signature: James R. Boyles Date: 2/24/22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS

Date of Revision	Section	Description
7/26/2021	1.1	LCSD MS4 permit number added.
7/26/2021	1.1	Subsector code table updated for composting due to a permit change
11/8/2021	4.0	Visual inspection requirement removed.

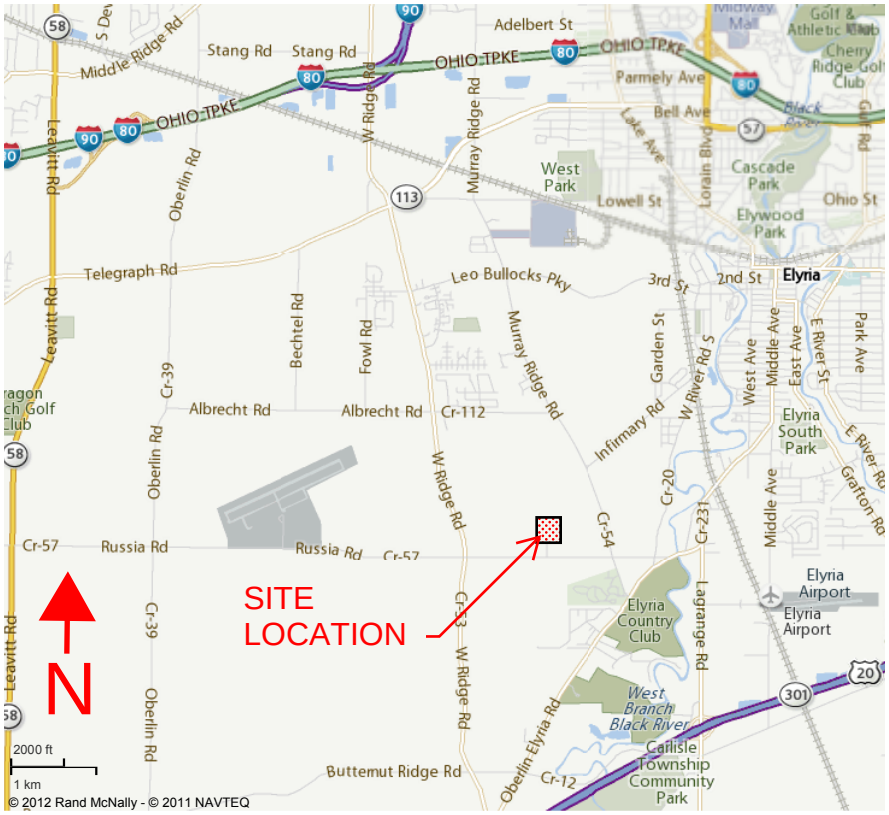
SWPPP ATTACHMENTS

Attachment A – General Location Map

Attachment B – Site Map

Attachment C – Ohio EPA NPDES Permit #OHR000006

Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)



LORAIN COUNTY HIGHWAY ENGINEER MAINTENANCE FACILITY

ATTACHMENT "A" - GENERAL LOCATION MAP

CB#1
VEGETATED DRAINAGE SWALE
CONDUIT & BARRIER STORAGE
VEGETATED DRAINAGE SWALE
762
COVERED SALT SHED
762
TOPSOIL STOCKPILES WITH GRINDING DRIVES AROUND
AGGREGATE PILE
OUTDOR PIPE STORAGE
CB#21
RECYCLED DRAINAGE STRUCTURES
TESTING NOTE:
QUARTERLY VISUAL ASSESSMENTS SHALL BE DONE AT OUTFALLS #1 – #6 AS SHOWN ON THIS SITE MAP. SAMPLES CAN BE TAKEN AT THE INLETS OF DRIVE PIPES FOR OUTFALL #'S 1, 3, 4, AND 5 TO ENSURE THE SAMPLE IS NOT MIXED WITH THE STRAW HAAG DITCH. THE SAMPLE TAKEN AT OUTFALL #2 SHALL BE AT THE OUTLET OF THE 12" PIPE. THE SAMPLE TAKEN AT OUTFALL #6 SHALL BE TAKEN JUST BEFORE THE ONSITE DITCH MEETS THE ROADSIDE DITCH.
STONE, GRAVEL, SAND, ETC. STOCKPILES
762
OUTFALL #6 TEST LOCATION
PAINT BARREL STORAGE ON CONCRETE PAD
PAINT AND SIGN SHED
CB#2
VEGETATED DRAINAGE SWALE
762
OLD CONCRETE SALT STORAGE SLAB (OUTSIDE STORAGE)
BOMB AND ARSENAL DETONATOR PIT
CB#3
CB#10
FUEL STATION W/ SPILL KIT
CB#11
CB#13
GRINDING STOCKPILES
CLEAN RECYCLED CONCRETE STOCKPILE
ASPHALT LOT
CB#5
CB#15
CB#12
CB#14
ASPHALT PARKING LOT
CB#4
LORAIN COUNTY MAINTENANCE GARAGE
COVERED VEHICLE AND EQUIPMENT STORAGE
OUTSIDE STORAGE AREA
CB#8
CB#6
CB#7
CB#9
ASPHALT / AGGREGATE LOT
ONSITE SANITARY LIFT STATION SYSTEM
CB#16
CB#17
VEGETATED DRAINAGE SWALE
CB#19
CB#18
CB#20
USED OIL STORAGE CONTAINER
OIL/WATER SEPARATOR TO SANITARY LIFT STATION
OLD VEHICLE STORAGE (SHERIFF OWNED)
STORM WATER OVERFLOW BASIN
54.68 ACRES
PPN. 1000002000024
VEGETATED DRAINAGE SWALE
STRAW HAAG DITCH
OUTFALL #5 TEST LOCATION
OUTFALL #4 TEST LOCATION
OUTFALL #3 TEST LOCATION
OUTFALL #2 TEST LOCATION
OUTFALL #1 TEST LOCATION
RUSSIA ROAD

DRAFTED BY: K.E. McCARTNEY & ASSOCIATES INC., JOB TITLE: SM-125, SHEET NAME: LORAIN COUNTY GARAGE - RUSSIA ROAD 2016.dwg, SCALE: 1 = 75', DATE: 3/1/16

K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

0 37.5 75 150
HORIZONTAL SCALE IN FEET

SITE PLAN - LORAIN COUNTY HIGHWAY GARAGE
42100 RUSSIA ROAD, ELYRIA, OH 44035

ATTACHMENT B

1
1

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

NPDES Permit Tracking No.:
N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Lorain County Maint. Facility

2. NPDES Permit Tracking No.: N/A

3. Facility Physical Address:

a. Street: 42100 Russia Rd

b. City: Elyria c. State: OH d. Zip Code: 44035-

4. Lead Inspectors Name: Title:

Additional Inspectors Name(s):

5. Contact Person: Title:

Phone: - - Ext. E-mail:

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
N/A

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:

N/A

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

N	/	A							

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
N/A

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ___ of ___ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: __/__/____

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: __/__/____

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
N/A

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Title:

Signature: Date Signed:

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Maintenance Form

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Routine Facility Inspection Report for MS4 Service Department

General Information			
Facility Name and MS4 Operator	Lorain County Highway Engineer Maintenance Facility		
NPDES Permit No.	OHR00000		
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			
Weather Information			
Weather at time of this inspection? ❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds ❑ Other: Temperature:			
Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No **If yes, describe:**			
Are there any discharges occurring at the time of inspection? ❑Yes ❑No **If yes, describe:**			

Structural Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Measures may include, but are not limited to, oil-water or hydrodynamic separators; storm water management ponds; bioretention areas; permeable pavement; cisterns; sand or other media filters; berms or curbs; covers such as tarps, roofs and lids; secondary containment structures; erosion and sediment controls, catch basin screens, sumps and inserts, spill kits, etc.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Vegetated Drainage Swales	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	Storm Water Overflow Basin	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	Salt Storage Shed (Roof/Sides/Berm)	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	Oil / Water Separator	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
5	Catch Basin #'s 1-5	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6	Catch Basin #'s 6-10	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7	Catch Basin #'s 11-15	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
8	Catch Basin #'s 16-20	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
9		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
10		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities Exposed to Storm Water

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	**Vehicle maintenance areas (mechanical repairs, body work, oil changes, etc.)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	**Vehicle washing area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	**Equipment cleaning (includes lawn mowers)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	**Outdoor vehicle and equipment storage/parking areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	**Fueling stations**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	**Salt and salt-containing material storage, loading and mixing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	**Snow disposal yard**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	**Storage yard for scrap, spare or unused materials and equipment**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
9	**Sand, dirt, ditch cleanings, mulch and aggregate storage piles**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	**Catch basin cleanings and street sweepings dewatering and solids management areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	**Yard waste storage and processing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	**Leaf collection area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
13	**Composting area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
14	**Pesticide, herbicide & fertilizer storage and application areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
15	**Hazardous waste collection area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
16	**Used oil storage drums and tanks**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
17	**Waste dumpsters**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
18	**Recycling area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
19	**Impound lot**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
20	**Dust generation and off-site vehicle tracking**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
21	**Indicators of illicit discharge**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Stormwater Pollution Prevention Plan

for:

Oberlin Westwood Cemetery
429 Morgan Street
Oberlin, OH 44074

SWPPP Contact(s):

Stormwater Coordinator
Jennifer Reeves
85 South Main Street
Oberlin, OH 44074
440-776-4871

SWPPP Preparation Date:

2/14/19

Revised:

6/5/19

7/30/21

11/9/21

3/21/22

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SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Oberlin Westwood Cemetery

Street: 429 Morgan Street

City: Oberlin State: OH ZIP Code: 44074

County: Lorain

MS4 Permit Number: 3GQ10012*DG Facility Permit Number: N/A

MS4 Permittee Name: Lorain County Storm Water Management District

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude:	Longitude:
1. 41 º 17 ' 13.66" N (degrees, minutes, seconds)	1. 82 º 14 ' 02.04" W (degrees, minutes, seconds)
2. _ _ º _ _ . _ _' N (degrees, minutes, decimal)	2. _ _ º _ _ . _ _' W (degrees, minutes, decimal)
3. _ _ . _ _ _ _ º N (decimal)	3. _ _ . _ _ _ _ º W (decimal)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS

☒ Other (please specify): Google Earth

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 2.84 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☒ Yes ☐ No

If yes, name of MS4 operator: City of Oberlin

Name(s) of water(s) that receive stormwater from your facility: Plum Creek

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No

If Yes, identify name of the impaired water (and segment, if applicable):_____

Identify the pollutant(s) causing the impairment:_____

For pollutants identified, which do you have reason to believe will be present in your discharge? _____

For pollutants identified, which have a completed TMDL? _____

Use the table below or refer to Attachment D in Permit OHR000006 to answer the following;

Description of Municipal Activities at this Facility: Maintenance Garage / Service Yard

Subsector(s) (choose all that apply): P1

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Compost Yard, Leaf Collection Yard	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

*If the transfer station is located at the landfill where the waste will be disposed, use Subsector L1.

1.2 Contact Information/Responsible Parties

MS4 Facility Operator (s):

Name: City of Oberlin
Address: 85 South Main Street
City, State, Zip Code: Oberlin, OH 44074
Telephone Number: 440-775-1531
Email address: jbaumann@cityofoberlin.com
Fax number: 440-775-7208

MS4 Facility Owner (s):

Name: City of Oberlin
Address: 85 South Main Street
City, State, Zip Code: Oberlin, OH 44074
Telephone Number: 440-775-1531
Email address: jbaumann@cityofoberlin.com
Fax number: 440-775-7208

MS4 SWPPP Contact:

Name: Jennifer Reeves, Stormwater Coordinator
Telephone number: 440-776-4871
Email address: jreeves@cityofoberlin.com
Fax number: 440-774-9714

1.3 Stormwater Pollution Prevention Team

Staff Names	Individual Responsibilities
Jennifer Reeves	Stormwater Coordinator
Jason Keltner	Buildings and Grounds Superintendent

1.4 Activities at the Facility

The City of Oberlin Westwood Cemetery is comprised of two maintenance / storage buildings, a small storage shed, and a house containing offices for the cemetery operations. All of these structures are located at the north of the property with access from Morgan Street.

Activities at the City of Oberlin Westwood Cemetery involve limited vehicle and equipment maintenance, storage, and washing; dirt, stone, gravel, topsoil, mulch etc. stockpiles; and material storage. All of these activities take place inside the two maintenance buildings as shown on the site map which is included in Attachment B.

1.5 General Location Map

A copy of the general location map for this facility is located in Attachment A.

1.6 Site Map

A copy of the site map for this facility is located in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Equipment and Vehicle Storage	Fuel, antifreeze, oils
Equipment and Vehicle Maintenance	Fuel, antifreeze, oils
Equipment Wash	Fuel, antifreeze, oils, sediment, detergents
Equipment and Vehicle Fueling	Fuel
Top Soil Stockpiling	Sediment
Stone, Gravel, Sand, etc. Stockpiling	Sediment
Materials Storage	Sediment and material particles
Used Oil Storage	Oils

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Stockpile Areas	Outfall #1, Outfall #2, Sheet flow to Plum Creek
Maintenance Areas	Outfall #1, Outfall #2
Fueling Area	Outfall #1, Outfall #2
Equipment Washing Area	Outfall #2, Sheet flow to Plum Creek
Used Oil Storage Container	Outfall #1
Vehicle and Equipment Storage Areas	Outfall #1, Outfall #2, Sheet flow to Plum Creek

Description of Past Spills/Leaks

Date	Description	Outfalls
	None	

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation: June 18, 2015
- Description of the evaluation criteria used: Site Inspection
- List of the outfalls or onsite drainage points that were directly observed during the evaluation: Plum Creek (Sheet Flow)
- Different types of non-stormwater discharge(s) and source locations: There are currently no known non-stormwater discharges at this site

  The following are acceptable non-storm water discharges (illicit discharges) only if they are not "significant contributors of pollutants to the MS4":

  - Water line flushing
  - Landscaping irrigation
  - Irrigation water
  - Diverted stream flows
  - Springs
  - Rising ground waters
  - Uncontaminated ground water infiltration
  - Uncontaminated pumped ground water
  - Flows from riparian habitats and wetlands
  - Discharges from potable water sources
  - Water from crawl space pumps
  - Foundation drains
  - Air conditioning condensation
  - Footing drains
  - Lawn watering
  - Individual residential car washing
  - Dechlorinated swimming pool discharges
  - Street wash water
  - Discharges or flows from firefighting activities

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. *For example, a catch basin was re-routed to sanitary for provide an area to dewater catch basin cleanings, the discharge of leachate from composting is being collected and sprayed back onto the piles, or an NPDES permit application was submitted for an unauthorized illicit discharge:* No unauthorized non-stormwater discharges were documented from the site. However, a drain located on the inside of the maintenance building has been stubbed as a preventative measure.
-

2.4 Salt Storage

N/A – There is no salt storage on this site.

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the extent practical. Following is a list of special structural controls or practices that are implemented to minimize the exposure to rain, snow, snowmelt and runoff specific to the Westwood Cemetery:

- The top soil, stone, gravel, sand, etc. stockpiles and storage areas are located so that the storm water runoff from them will pass over a green belt strip to remove sediment and pollutants, before discharging from the site.
- Vehicle and equipment maintenance is done inside the maintenance buildings that have concrete slabs that would prevent any infiltration of spills and allow for spill procedures to be followed.
- Small equipment fueling occurs on site. All fueling operations are performed on a concrete slab either inside the maintenance buildings or on a pervious gravel parking lot outside that drain to grass filter strips.
- Vehicles and equipment are stored inside the maintenance buildings to control the potential of pollution, from spills and leaks.
- The used oil storage container is located on a concrete slab to protect against the possibility of pollution from a spill or leak.
- The equipment wash is located in a grass area near the maintenance building so that water runs over green belt strips prior to reaching Plum Creek.
- Materials are mainly stored inside the two maintenance buildings to prevent exposure to stormwater.
- Uncovered outside storage areas are graded so that the runoff passes over a green belt strip and then drains into vegetated swales before discharging into Plum Creek.

- Provide clay berm to capture runoff from the stone/mulch stockpile.
- Grass filter strips are used around and throughout the entire site to control sediment and pollutants, discharging from the site.

Figure 1 – Stone / Mulch Stockpile

Figure 2 – Interior Drain (stubbed)

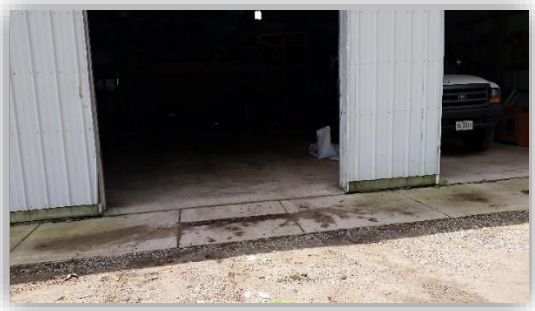


Figure 3 – Exterior Drain Maintenance Building

Figure 4 – Maintenance Building

3.2 Good Housekeeping

The intent of Good Housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which helps to reduce the potential of pollution of storm water. The following prevention measures shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights so as to be easily accessed.
- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation.
- Make sure items are stored away from areas where the chance of an accident to occur is greater.

- Refill materials in secondary containments or indoors.
- Look to install leak detection devices, overflow controls and diversion berms.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or nontoxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up drips and spills promptly.
- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.

Waste material shall be picked up on a regular schedule, set by the City with additional pickups when needed. Storage containers shall be inspected, yearly at a minimum, along with equipment and vehicles being used regularly. Stored vehicles and equipment shall be continuously inspected for leaks.

Figure 5 – Dumpster Location

Figure 6 – Equipment / Hazardous Material Storage

3.3 Maintenance

It is important to properly inspect and maintain equipment, vehicles and systems, including green areas, storm sewer, and sanitary system associated with the City of Oberlin to detect potential issues that may cause pollutants to storm water. Green areas shall be mowed and cleaned of debris.

3.4 Spill Prevention and Response

When a spill does occur, quick and effective response will prevent pollutants from reaching storm water. Spills will be cleaned up promptly and not allowed to evaporate so that pollutants do not remain on the pavement to be washed to the storm drains with the next rain or remain in the soil to become a possible groundwater pollutant. If the spill is on an unpaved surface, determine whether the contaminated soil should be removed to prevent it from being a source of future storm water pollutants. Spill procedures will also include cleaning up leaks, drips, and other spills without water whenever possible. It is important to make sure that all the material is picked up and that the cleanup waste is properly disposed of and stored until removed.

Spill prevention and response procedures for hazardous materials stored or handled onsite will follow the procedures described in the facility Hazardous Materials Management Plan. Responsible personnel will contain and collect the spilled substance, then dispose of the substances and any contaminated soil in compliance with local hazardous materials regulations.

With any spill it is important to determine the scope of spill and follow the appropriate procedure outlined below. Non-hazardous spills can be categorized as small spills, medium spills and large spills.

- Small spills**:** These are spills that can be wiped up with a shop rag. Wet rags will not be put in the dumpster with the shop trash. They will be stored in a covered bin like the kind used at auto service stations. Used rags will be sent to a professional cleaning service or disposed of with the hazardous wastes if necessary.

- Medium-sized spills**:** These are spills too large to wipe up with a rag. Medium sized spills will be contained and soaked up using dry absorbent material such as: Vermiculite, specially-prepared sawdust, or kitty litter. Absorbent snakes may be used as temporary brooms to contain and soak up the liquid. Used absorbent material will be swept up or collected and will be disposed of with the shop trash if non-hazardous or with the hazardous wastes if necessary. A wet/dry shop vacuum cleaner may also be used to collect spills and dispose of the liquid with hazardous wastes. Vacuums will not be used for gasoline, solvents, or other volatile fluids, because the enclosed vacuum may become an explosive hazard.

- Large spills**:** Spills of non-hazardous liquids will be contained and cleaned using a minimum amount of wash water. Storm drain inlets or sewer inlets will be plugged to prevent the spill from entering the MS4. Temporary plugs will be kept onsite for the facility inlets and employees will be trained in when and how to use them.

- Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, 40 CFR Part 302, occurs during a 24-hour period, you shall notify the Ohio EPA Division of Emergency and Remedial Response at (800)282-9378 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. Contact information shall be in locations that are readily accessible and available.

A Spill/Release Incident Reporting form should be filled out promptly after a spill or release and kept for OEPA auditing.

It is important that every employee is aware of the spill prevention, control and cleanup procedures. Training sessions for the employees along with mock spill response sessions should be conducted on an annual basis to prepare employees for real spills. There shall be spill response kits in all buildings and outdoors near fueling or loading stations. The spill response kit should contain:

- Absorbents
- Broom/dust pan
- Shovel
- Berms/socks

- Paper or cloth towels
- Safety goggles and gloves
- Phone numbers for appropriate cleanup authorities

The spill kits must be replenished soon after usage and checked at regular intervals. There will also be "Spill Response Procedures" posters posted around the facility.

Figure 7 – Oil Dry for Spill Prevention

3.5 Erosion and Sediment Controls

The erosion and sediment controls are implemented stabilization measures, and green belt strips. Also, there is to be silt fence around the top soil stockpiling area which is located in the southwest corner of the property. The site is fairly flat, so there are no steep slopes. All roads/drives, material storage and staging areas and parking lots are either concrete, asphalt, gravel or recycled grindings to control erosion and potential offsite discharges of sediment. All disturbed areas are seeded and mulched per MS4 criteria.

The City shall pay special attention to the topsoil stockpile area at the southwest corner of the property and ensure that the area is stabilized per requirement of the MS4. The City shall also consider added silt fence around the stockpile during times of high usage. The stockpile is in close proximity (roughly 50') to a swale that is present on the adjacent property. This swale feed directly into Plum Creek.

3.6 Management of Runoff

The site is designed to help manage runoff by routing runoff over grass filter strips with minimum slope and allow for infiltration. Impervious area has been developed as asphalt drives throughout the cemetery. Any stormwater that does not infiltrate the soil runs flows as sheet flow onto the adjacent properties to the east and south. This water is eventually collected by Plum Creek

3.7 Salt Storage Piles or Piles Containing Salt

N/A – This site has no salt storage.

3.8 MSGP Sector-Specific Non-Numeric Effluent Limits

N/A – This site (sector P) has no non-numeric effluent limits

3.9 Employee Training

Successful storm water pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the City of Oberlin Westwood Cemetery. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm drains, because the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain so that they understand the importance of preventing storm water pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel.
- New personnel will be required to review and understand this document prior to initiating work activities.
- Retraining will be completed, if violations continue to occur.
- Information material shall be displayed to remind workers of BMPs practices.
- Contractors working at the facility shall be required to complete Pollution Protection training.

3.10 Non-Stormwater Discharges

The MS4 Permit prohibits discharges of anything but storm water to the MS4. Field Inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm drain are prohibited, including storm drain connections from indoor drains or sinks. These are known as illicit connections and must be eliminated.

Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm drains, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this

improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures to help prevent non-storm water discharges will be implemented:

1. Provide well marked proper disposal or collection methods for solid or liquid waste.
2. Train employees in proper disposal of non-storm water discharges. Employees will be educated to understand that storm drains connect directly to waterways without treatment.
3. Label all storm drain inlets and catch basins "No dumping—flows to streams" so employees can tell which inlets are part of the storm drain system.
4. Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-storm water discharges.
5. Periodically inspect and maintain storm drain inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm systems.
6. Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.
7. Check for possible pollutants at the storm water outfall locations and identify the pollutant to correct the situation.

3.11 Waste, Garbage and Floatable Debris

Solid waste dumpster and garbage receptacles have been placed around the site and in the sheds and building for the collection of garbage. The lids must be kept closed on the outside receptacles. Employees are encouraged to keep the areas they are working in, clean and waste/garbage free. Debris on the site will be picked up.

The collected waste, garbage and debris will be removed and disposed of at approved locations.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

The site is in an urban setting. The drives and material storage and staging are covered with materials that control dust generation and also eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

For the routine facility inspections and the comprehensive site inspections to be performed at your site, include a description of the following:

- The names of the person(s), or the positions of the person(s), responsible for inspection: The facility manager or a City of Oberlin representative.

- The schedules to be used for conducting inspections. Routine Facility Inspections are to be conducted quarterly, unless otherwise specified in Part 8 sector-specific requirements, and comprehensive site inspections are to be conducted annually: Routine facility inspections shall be performed once per calendar quarter, and comprehensive site inspections shall be performed once yearly. The comprehensive site inspection may be used for one of the routine inspections and

- Specific areas of the facility to be inspected, including schedules for specific outfalls:
  Routine facility inspections shall include inspection of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. outdoor storage, storage buildings/sheds, vehicles), and of all storm water control measures used on site (i.e. vegetated swales or biofilters).

  Comprehensive site inspections shall consist of an inspection of the entire site including all areas reviewed for routine facility inspections, areas where spills and leaks have occurred in the past three years, and a review of monitoring data collected by the quarterly visual assessments. Inspectors shall also examine the following:

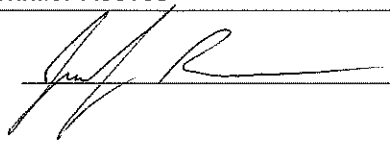
  - Industrial materials, residue, or trash that may have or could come into contact with storm water
  - Leaks or spills from industrial equipment, drums, tanks, and other containers
  - Offsite tracking of industrial or waste material, or sediment where vehicles enter or exit the site
  - Tracking or blowing of materials (including waste) from areas of no exposure to exposed areas
  - Storm water control measures needing replacement, maintenance, or repair

  Storm water controls measures shall be observed to ensure they are functioning correctly. If discharge locations are inaccessible, nearby downstream locations shall be inspected.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Jennifer Reeves Title: Stormwater Coordinator

Signature:  Date: 3/24/22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS

Date of Revision	Section	Description
6/5/2019		Updated NPDES Permit No.
7/27/2021	1.1	Subsector code table updated for composting due to a permit change
7/30/2021	2.2	updated the outfall for potential spill and leaks
7/30/2021	1.1	Added permit number and Lorain Country SWMD as the MS4
11/9/2021	4.0	Visual inspection requirement removed.
3/21/2022	1.2	Updating Contact information
3/21/2022	1.3	Updating Stormwater Team

SWPPP ATTACHMENTS

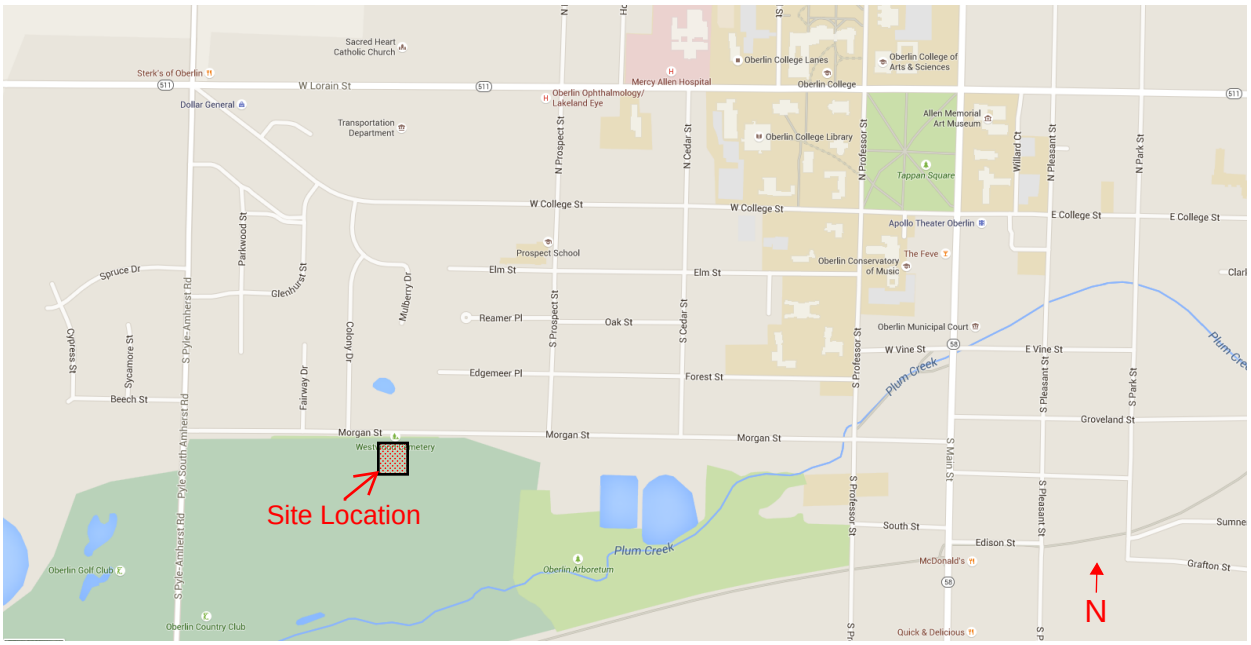
Attachment A – General Location Map

Attachment B – Site Map

Attachment C – Ohio EPA NPDES Permit #OHR000006

Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)

Attachment A – General Location Map



City of Oberlin Cemetery

Attachment B – Site Map

Z:\GS\GS-685 Oberlin SWU\Documents\SWP3\Oberlin Cemetery\cemetery site map.dwg, Model, 1/28/2019 12:25:58 PM, 1:80

DRAFTED BY K.E. McCARTNEY & ASSOCIATES INC., JOB TITLE: GS-685 SHEET NAME: CEMETERY SITE MAP.DWG SCALE: 1" = 80' DATE: 8/6/15

1	APPENDIX B	SITE PLAN - OBERLIN WESTWOOD CEMETERY	0 40 80 160 HORIZONTAL SCALE IN FEET

KEM K.E. McCARTNEY & ASSOCIATES ENGINEERS • PLANNERS • SURVEYORS

Attachment C – Ohio EPA NPDES Permit #OHR000006

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)

NPDES Permit Tracking No.:
N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name:

2. NPDES Permit Tracking No.: N/A

3. Facility Physical Address:

a. Street:

b. City: c. State: d. Zip Code: -

4. Lead Inspectors Name: Title:

Additional Inspectors Name(s):

5. Contact Person: Title:

Phone: - - Ext. E-mail:

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
N/A

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:

N/A

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

N	/	A							

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
N/A

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ___ of ___ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: __/__/____

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: __/__/____

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
N/A

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Title:

Signature: Date Signed:

Oberlin Westwood Cemetery
Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name			
NPDES Tracking No.			
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information

Weather at time of this inspection?
❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature:

Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No
If yes, describe:

Are there any discharges occurring at the time of inspection? ❑Yes ❑No
If yes, describe:

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	SCM #1 – Clay Berm	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	OF01	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	OF02	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	OF03	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
5		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	**Material loading/unloading and storage areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	**Equipment operations and maintenance areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	**Fueling areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	**Outdoor vehicle and equipment washing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	**Waste handling and disposal areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	**Erodible areas/construction**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	**Non-stormwater/ illicit connections**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	**Salt storage piles or pile containing salt**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
9	**Dust generation and vehicle tracking**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	**(Other)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	**(Other)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	**(Other)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Maintenance Form

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Stormwater Pollution Prevention Plan

for:

Oberlin Compost Facility
E Lorain Street
Oberlin, OH 44074

SWPPP Contact(s):

Stormwater Coordinator
Jennifer Reeves
85 South Main Street
Oberlin, OH 44074
440-776-4871

SWPPP Preparation Date:

12/15/16

Revised:

6/5/19

7/27/21

11/9/21

3/21/22

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SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Oberlin Compost Facility

Street: E Lorain St

City: Oberlin State: OH ZIP Code: 44074

County: Lorain

MS4 Permit Number: 3GQ10012*DG Facility Permit Number: N/A

MS4 Permittee Name: Lorain County Storm Water Management District

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude:	Longitude:
1. 41 º 17 ' 38.38" N (degrees, minutes, seconds)	1. 82 º 11 ' 08.05" W (degrees, minutes, seconds)
2. _ _ º _ _ . _ _' N (degrees, minutes, decimal)	2. _ _ º _ _ . _ _' W (degrees, minutes, decimal)
3. _ _ . _ _ _ _ º N (decimal)	3. _ _ . _ _ _ _ º W (decimal)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS

☒ Other (please specify): Google Earth

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 0.45 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☒ Yes ☐ No

If yes, name of MS4 operator: City of Oberlin

Name(s) of water(s) that receive stormwater from your facility: Plum Creek

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No

If Yes, identify name of the impaired water (and segment, if applicable):_____

Identify the pollutant(s) causing the impairment:_____

For pollutants identified, which do you have reason to believe will be present in your discharge? _____

For pollutants identified, which have a completed TMDL? _____

Use the table below or refer to Attachment D in Permit OHR000006 to answer the following;

Description of Municipal Activities at this Facility: Compost Yard

Subsector(s) (choose all that apply): C6

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Compost Yard, Leaf Collection Yard	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

*If the transfer station is located at the landfill where the waste will be disposed, use Subsector L1.

1.2 Contact Information/Responsible Parties

MS4 Facility Operator (s):

Name: City of Oberlin
Address: 85 South Main Street
City, State, Zip Code: Oberlin, OH 44074
Telephone Number: 440-775-1531
Email address: jbaumann@cityofoberlin.com
Fax number: 440-775-7208

MS4 Facility Owner (s):

Name: City of Oberlin
Address: 85 South Main Street
City, State, Zip Code: Oberlin, OH 44074
Telephone Number: 440-775-1531
Email address: jbaumann@cityofoberlin.com
Fax number: 440-775-7208

MS4 SWPPP Contact:

Name: Jennifer Reeves, Stormwater Coordinator
Telephone number: 440-776-4871
Email address: jreeves@cityofoberlin.com
Fax number: 440-774-9714

1.3 Stormwater Pollution Prevention Team

Staff Names	Individual Responsibilities
Jennifer Reeves	Stormwater Coordinator
Dawn Ferro	General Maintenance, Division Superintendent

1.4 Activities at the Facility

The City of Oberlin Compost Facility is comprised mainly of outdoor storage and composting areas. Two empty buildings are located on the site in the southwest corner of the property which are to be demolished. Also on site, to the north, is a small building and shooting range used by the Oberlin Police Department.

Activities at the City of Oberlin Compost Facility involve construction demolition debris (C&DD) storage; dirt, stone, gravel, sand, etc. stockpiles; and material storage.

1.5 General Location Map

A copy of the general location map for this facility is located in Attachment A.

1.6 Site Map

A copy of the site map for this facility is located in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Top Soil Stockpiling / Compost	Sediment
Stone, Gravel, Sand, Mulch, etc. Stockpiling	Sediment
Materials Storage	Sediment and material particles
Construction and Demolition Debris Storage	Sediment and material particles

Figure 1 – Construction and Demolition Debris / Material Storage

Figure 2 – Compost Pile

Figure 3 – Topsoil Stockpile

Figure 4 – Mulch Stockpile

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Stockpile Areas	Plum Creek
Material Storage Areas	Plum Creek

Description of Past Spills/Leaks

Date	Description	Outfalls
	None	

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation: June 18, 2015
- Description of the evaluation criteria used: Site Inspection
- List of the outfalls or onsite drainage points that were directly observed during the evaluation: Flow through swale/ditch as shown on the site map, and through sheet flow along the southeast of the property. There are 3 sheet flow outfalls to be assessed as shown in Attachment B.
- Different types of non-stormwater discharge(s) and source locations: There are currently no known non-stormwater discharges at this site.

The following are acceptable non-storm water discharges (illicit discharges) only if they are not "significant contributors of pollutants to the MS4":

- Water line flushing
- Landscaping irrigation
- Irrigation water
- Diverted stream flows
- Springs
- Rising ground waters
- Uncontaminated ground water infiltration
- Uncontaminated pumped ground water
- Flows from riparian habitats and wetlands
- Discharges from potable water sources
- Water from crawl space pumps
- Foundation drains
- Air conditioning condensation
- Footing drains
- Lawn watering
- Individual residential car washing
- Dechlorinated swimming pool discharges
- Street wash water
- Discharges or flows from firefighting activities

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. No unauthorized non-stormwater discharges were documented from the site.

2.4 Salt Storage

N/A – There is no salt storage on this site.

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the extent practical. Following is a list of special structural controls or practices that are implemented to minimize the exposure to rain, snow, snowmelt and runoff specific to the Compost Facility:

- The construction and demolition debris, topsoil soil, stone, gravel, sand, etc. stockpiles and storage areas are located so that the storm water runoff from them will pass over grass filters and vegetated swales to remove sediment and pollutants, before discharging from the site.
- Grass filters are used around and throughout the entire site to control sediment and pollutants, discharging from the site.

3.2 Good Housekeeping

The intent of Good Housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which helps to reduce the potential of pollution of storm water. The following prevention measures shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights so as to be easily accessed.
- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation.
- Make sure items are stored away from areas where the chance of an accident to occur is greater.
- Refill materials in secondary containments or indoors.
- Look to install leak detection devices, overflow controls and diversion berms.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or nontoxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up drips and spills promptly.
- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.

Waste material including non-reusable construction debris shall be picked up on a regular schedule, set by the County or additional picks ups when needed. Storage containers shall be inspected, yearly at a minimum, along with equipment and vehicles being used regularly.

3.3 Maintenance

It is important to properly inspect and maintain vegetated swales and green areas to prevent potential issues that may cause pollutants to storm water. Vegetated swales shall be cleaned of debris yearly or after major storm events. Green areas shall be mowed and cleaned of debris. The City shall also ensure that all areas that that are used as drives maintained and covered with a material that controls erosion as mentioned in section 3.5.

All drive areas shall be covered with proper material such as gravel. See section 3.5

3.4 Spill Prevention and Response

No hazardous material spills are anticipated on site as no industrial activity that would be associated with spills occur at the Compost Facility.

3.5 Erosion and Sediment Controls

The erosion and sediment controls are implemented stabilization measures, green belt strips, vegetated swales, and berms. All roads/drives, material storage and staging areas and parking lots are either concrete, gravel or recycled grindings to control erosion and potential offsite discharges of sediment. All disturbed areas are seeded and mulched per Rainwater and Land Development Manual criteria.

The City shall review the site and stabilize all areas that are currently not wooded with gravel or erosion control matting and seed/mulch as per Rainwater and Land Development Manual standards to prevent rill / gully erosion as shown in the picture below.

Minor rill erosion observed off of a compost pile during site visit 6-18-15.

Areas like these shall be stabilized per MS4 criteria.

3.6 Management of Runoff

The site is designed to help manage runoff by routing runoff over grass filters with minimum slope and then collecting the runoff in vegetated swales to slow down the rate of discharge and allow for infiltration. Any runoff that does not get infiltrated drains to Plum Creek as surface drainage. Minimum amounts of impervious surfaces have been constructed, which helps control the increase of discharge from the site.

Natural vegetation has been left where ever possible.

3.7 Salt Storage Piles or Piles Containing Salt

N/A – This site has no salt storage.

3.8 MSGP Sector-Specific Non-Numeric Effluent Limits

N/A – This site (sector P) has no non-numeric effluent limits

3.9 Employee Training

Successful storm water pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the City of Oberlin Compost Facility. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm drains, because the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain so that they understand the importance of preventing storm water pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel.
- New personnel will be required to review and understand this document prior to initiating work activities.
- Retraining will be completed, if violations continue to occur.
- Information material shall be displayed to remind workers of BMPs practices.
- Contractors working at the facility shall be required to complete Pollution Protection training.

3.10 Non-Stormwater Discharges

The MS4 Permit prohibits discharges of anything but storm water to the MS4. Field Inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm drain are prohibited, including storm drain connections from indoor drains or sinks. These are known as illicit connections and must be eliminated.

Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm drains, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures to help prevent non-storm water discharges will be implemented:

1. Provide well marked proper disposal or collection methods for solid or liquid waste.
2. Train employees in proper disposal of non-storm water discharges. Employees will be educated to understand that storm drains connect directly to waterways without treatment.
3. Label all storm drain inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm drain system.
4. Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-storm water discharges.
5. Periodically inspect and maintain storm drain inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm systems.
6. Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.
7. Check for possible pollutants at the storm water outfall locations and identify the pollutant to correct the situation.

3.11 Waste, Garbage and Floatable Debris

This site does not have any garbage receptacles on site as it is not anticipated that workers are to be located here for long periods of time. Any waste, garbage, or debris shall be taken off site by employees and disposed of at a proper location.

The City does store empty dumpsters on the site that are not intended for on-site use. These dumpsters are to remain empty so that they can be easily transported to off-site locations.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

The site is in a rural setting. The drives and material storage and staging are covered with materials that control dust generation and also eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

For the routine facility inspections and the comprehensive site inspections to be performed at your site, include a description of the following:

- The names of the person(s), or the positions of the person(s), responsible for inspection: The facility manager or a City of Oberlin representative.

- The schedules to be used for conducting inspections. Routine Facility Inspections are to be conducted quarterly, unless otherwise specified in Part 8 sector-specific requirements, and comprehensive site inspections are to be conducted annually: Routine facility inspections shall be performed once per calendar quarter, and comprehensive site inspections shall be performed once yearly. The comprehensive site inspection may be used for one of the routine inspections and

- Specific areas of the facility to be inspected, including schedules for specific outfalls:
  Routine facility inspections shall include inspection of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. outdoor storage, outdoor stockpiles storage buildings/sheds, vehicles), and of all storm water control measures used on site (i.e. vegetated swales or biofilters, gravel areas to ensure all areas are stabilized).

  Comprehensive site inspections shall consist of an inspection of the entire site including all areas reviewed for routine facility inspections, areas where spills and leaks have occurred in the past three years, and a review of monitoring data collected by the quarterly visual assessments. Inspectors shall also examine the following:

  - Industrial materials, residue, or trash that may have or could come into contact with storm water
  - Leaks or spills from industrial equipment, drums, tanks, and other containers
  - Offsite tracking of industrial or waste material, or sediment where vehicles enter or exit the site
  - Tracking or blowing of materials (including waste) from areas of no exposure to exposed areas
  - Storm water control measures needing replacement, maintenance, or repair

  Storm water controls measures shall be observed to ensure they are functioning correctly. If discharge locations are inaccessible, nearby downstream locations shall be inspected.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Jennifer Reeves Title: Stormwater Coordinator

Signature: Jennifer Reeves Date: 3/24/22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS

Date of Revision	Section	Description
6/5/2019		Updated NPDES Permit No.
7/27/2021	1.1	Subsector code table updated for composting due to a permit change
7/27/2021	1.1	Subsector code changed to Composting due to permit change.
7/27/2021	1.1	Added permit number and Lorain Country SWMD as the MS4
11/9/2021	4.0	Visual inspection requirement removed.
3/21/2022	1.2	Updating Contact information
3/21/2022	1.3	Updating Stormwater Team

SWPPP ATTACHMENTS

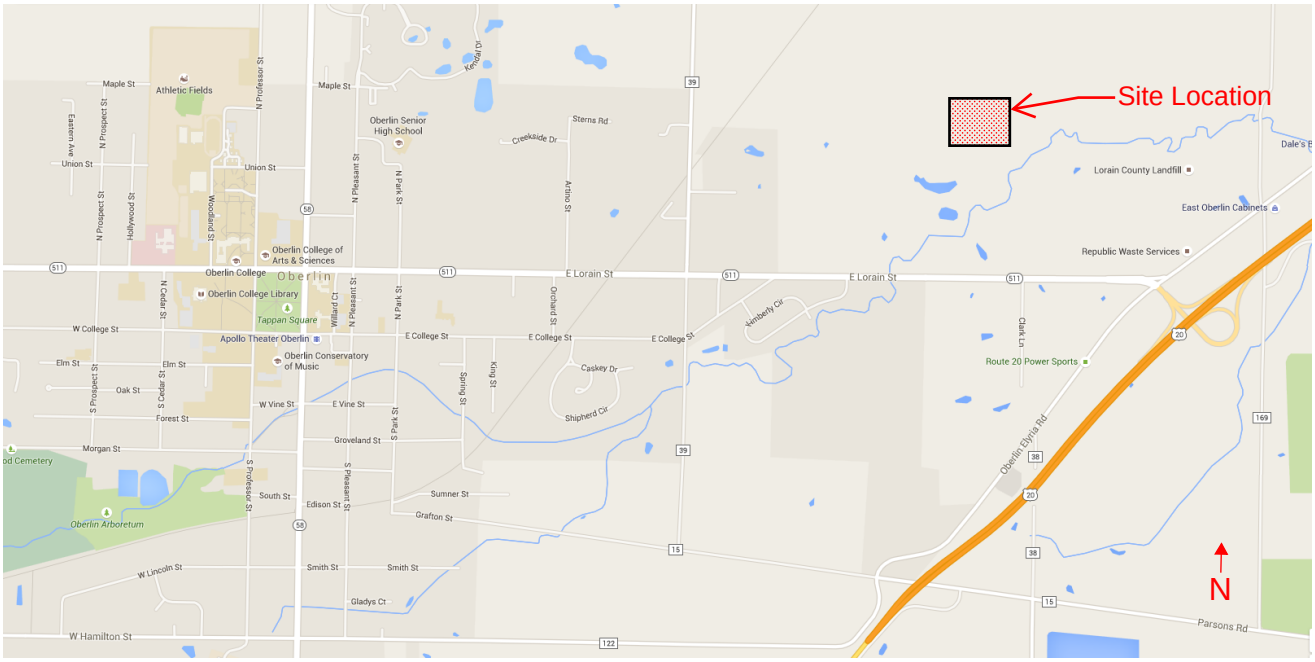
Attachment A – General Location Map

Attachment B – Site Map

Attachment C – Ohio EPA NPDES Permit #OHR000006

Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)

Attachment A – General Location Map



City of Oberlin Compost Facility

Attachment B – Site Map

E. LORAIN STREET (S.R. 511)

EMPTY BUILDINGS (TO BE DEMOLISHED)

SWALE/DITCH

MATERIAL STORAGE / CONSTRUCTION DEBRIS

SCM 1 VEGETATED FILTER

Outfall #2

COMPOST AREA

SCM 3 VEGETATED FILTER

OBERLIN POLICE SHOOTING RANGE

EQUALIZATION BASINS

Outfall #3

DUMPSTER STORAGE AREA

SWALE/DITCH

SCM 2 VEGETATED FILTER

TOPSOIL STOCKPILE AREA

FLOW ARROW (TYP.)

32.731 ACRES

PPN. 0900079000003

Outfall #1

PLUM CREEK

K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

0 50 100 200
HORIZONTAL SCALE IN FEET

SITE PLAN - OBERLIN COMPOST FACILITY PROJECT

APPENDIX B

DRAFTED BY: K.E. McCARTNEY & ASSOCIATES INC. JOB TITLE: GS-885 SHEET NAME: APPENDIX B.dwg SCALE: 1 = 100 DATE: 4/11/16

Attachment C – Ohio EPA NPDES Permit #OHR000006

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

Attachment D – Inspection Forms

Comprehensive Site Inspection

Routine Facility Inspection

Miscellaneous Forms

NPDES Permit Tracking No.:
N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name:

2. NPDES Permit Tracking No.: N/A

3. Facility Physical Address:

a. Street:

b. City: c. State: d. Zip Code: -

4. Lead Inspectors Name: Title:

Additional Inspectors Name(s):

5. Contact Person: Title:

Phone: - - Ext. E-mail:

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
N/A

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:

N/A

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

N	/	A							

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
N/A

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ___ of ___ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: __/__/____

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: __/__/____

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
N/A

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Title:

Signature: Date Signed:

Oberlin Compost Facility
Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name			
NPDES Tracking No.			
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information

Weather at time of this inspection?
❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature:

Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No
If yes, describe:

Are there any discharges occurring at the time of inspection? ❑Yes ❑No
If yes, describe:

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	SCM 1 – Vegetated Filter	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	SCM 2 – Vegetated Filter	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	SCM 3 – Vegetated Filter	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
5		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	Equipment operations and maintenance areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	Fueling areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	Outdoor vehicle and equipment washing areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	Waste handling and disposal areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	Erodible areas/construction	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	Non-stormwater/ illicit connections	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	Salt storage piles or pile containing salt	❑Yes ❑No ❑ N/A	❑Yes ❑No	
9	Dust generation and vehicle tracking	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Maintenance Form

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Stormwater Pollution Prevention Plan

for:

Oberlin Municipal Light & Power System
289 South Professor Street
Oberlin, OH 44074

SWPPP Contact(s):

Stormwater Coordinator
Jennifer Reeves
85 South Main Street
Oberlin, OH 44074
440-776-4871

SWPPP Preparation Date:

4/14/16

Revised:

8/25/20

7/30/21

11/9/21

3/21/22

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SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Oberlin Municipal Light & Power System

Street: 289 South Professor Street

City: Oberlin State: OH ZIP Code: 44074

County: Lorain

MS4 Permit Number: 3GQ10012*CG Facility Permit Number: N/A

MS4 Permittee Name: Lorain County Storm Water Management District

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude:	Longitude:
1. 41 º 17 ' 01.77" N (degrees, minutes, seconds)	1. 82 º 13 ' 11.62" W (degrees, minutes, seconds)
2. _ _ º _ _ . _ _' N (degrees, minutes, decimal)	2. _ _ º _ _ . _ _' W (degrees, minutes, decimal)
3. _ _ . _ _ _ _ º N (decimal)	3. _ _ . _ _ _ _ º W (decimal)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS

☒ Other (please specify): Google Earth

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 4.74 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☒ Yes ☐ No

If yes, name of MS4 operator: City of Oberlin

Name(s) of water(s) that receive stormwater from your facility: Plum Creek

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No

If Yes, identify name of the impaired water (and segment, if applicable):_____

Identify the pollutant(s) causing the impairment:_____

For pollutants identified, which do you have reason to believe will be present in your discharge? _____

For pollutants identified, which have a completed TMDL? _____

Use the table below or refer to Attachment D in Permit OHR000006 to answer the following;

Description of Municipal Activities at this Facility: Maintenance Garage, Material Stockpiling, Fleet Parking

Subsector(s) (choose all that apply): P1, O1

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Compost Yard, Leaf Collection Yard	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

1.2 Contact Information/Responsible Parties

MS4 Facility Operator(s):

Name: City of Oberlin
Address: 85 South Main Street
City, State, Zip Code: Oberlin, OH 44074
Telephone Number: (440) 775-1531
Email address: jbaumann@cityofoberlin.com
Fax number: (440) 775-7208

MS4 Facility Owner(s):

Name: City of Oberlin
Address: 85 South Main Street
City, State, Zip Code: Oberlin, OH 44074
Telephone Number: (440) 775-1531
Email address: jbaumann@cityofoberlin.com
Fax number: (440) 775-7208

MS4 SWPPP Contact:

Name: Jennifer Reeves, Stormwater Coordinator
Telephone number: 440-776-4871
Email address: jreeves@cityofoberlin.com
Fax number: 440-774-9714

1.3 Stormwater Pollution Prevention Team

Staff Names	Phone	Email	Individual Responsibilities
Jennifer Reeves	(440) 776-4871	jreeves@cityofoberlin.com	Stormwater Coordinator
Steve Wilson	(440) 775-7260	swilson@omlps.org	Generation Superintendent
Doug McMillan	(440) 775-7260	dmcmillan@omlps.org	Director

1.4 Activities at the Facility

The City of Oberlin Municipal Light & Power System Complex serves as the main electric power provider to residential and commercial customers throughout the City of Oberlin. The site is made up of a power plant, an office building, three maintenance and storage garages, two garages for vehicle and equipment storage, a fueling station, and stone stockpile area.

Maintenance of equipment and vehicles primarily takes place in the three maintenance garages. Maintenance activities include oil changes and other regularly scheduled maintenance on all vehicles and equipment. Oil and other waste from vehicle maintenance are properly stored within storage containers inside the maintenance garages until properly disposed of.

Washing of vehicles and equipment also takes place inside the maintenance garages. The wash water is collected by interior trench drains and directed to an oil/water separator that is routed to the sanitary sewer.

1.5 General Location Map

A copy of the general location map for this facility is located in Attachment A.

1.6 Site Map

A copy of the site map for this facility is located in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Outdoor Equipment and Vehicle Storage	Oil, hydraulic fluids, arsenic, heavy metals, organics, fuel
Equipment and Vehicle Maintenance	Oil, arsenic, heavy metals, organics, chlorinated solvents, acid/alkaline wastes, ethylene glycol
Equipment and Vehicle Wash	Oil, detergents, heavy metals, chlorinated solvents, phosphorus, salts, suspended solids, acid/alkaline wastes
Equipment and Vehicle Fueling	Fuel, oil, heavy metals
Stone, Gravel, Sand, etc. Stockpiling	Sediment
Materials Storage	Sediment, material particles
Used Oil Storage	Oil

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Outdoor Material Storage	Outfall #1
Stone/Gravel Stockpile	Outfall #3
Vehicle and Equipment Storage Areas	Outfall #1, Outfall #2, Outfall #3

Description of Past Spills/Leaks

Date	Description	Outfalls
	None	

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation:
  June 18, 2015
- Description of the evaluation criteria used:
  Site Inspection
- List of the outfalls or onsite drainage points that were directly observed during the evaluation:
  Outfall #1, Outfall #2 & Outfall #3 (See Attachment B)
- Different types of non-stormwater discharge(s) and source locations:
  There are currently no known non-stormwater discharges at this site

  The following are acceptable non-storm water discharges (illicit discharges) only if they are not "significant contributors of pollutants to the MS4":

  - Water line flushing
  - Landscaping irrigation
  - Irrigation water
  - Diverted stream flows
  - Springs
  - Rising ground waters
  - Uncontaminated ground water infiltration
  - Uncontaminated pumped ground water
  - Flows from riparian habitats and wetlands
  - Discharges from potable water sources
  - Water from crawl space pumps
  - Foundation drains
  - Air conditioning condensation
  - Footing drains
  - Lawn watering
  - Individual residential car washing
  - Dechlorinated swimming pool discharges
  - Street wash water
  - Discharges or flows from firefighting activities

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified:
  No unauthorized non-stormwater discharges were documented from the site.

2.4 Salt Storage

There is no salt storage on this site.

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the extent practical. Following is a list of special structural controls or practices that are implemented to minimize the exposure to rain, snow, snowmelt and runoff:

- The stone/gravel stockpiles are located within outdoor chambers that limit runoff to one direction.
- Concrete curbing around the fuel storage tanks provide secondary containment. Fueling hoses with check valves are used to prevent hose drainage after filling.
- Vehicle fueling is contained within a berm and drained with a manual valve.
- Vehicle and equipment maintenance is done inside the maintenance garages within a bay that has a trench/floor drain to contain any spills and is routed through an oil/water separator.
- Vehicles and equipment are stored under cover and on concrete pavement to control potential pollution from spills and leaks. The areas are graded so that any runoff will drain to interior drains that are routed through the oil/water separator.
- The used oil storage container is located on a concrete slab to help protect against the possibility of pollution from a spill or leak.
- Vehicle and equipment washing is done inside the garages within a bay that has a trench/floor drain that collects the wash water and is routed through an oil/water separator.

Figure 1 – Outdoor Stone/Gravel Stockpile

Figure 2 – Fuel Storage

Figure 3 – Used Oil Storage

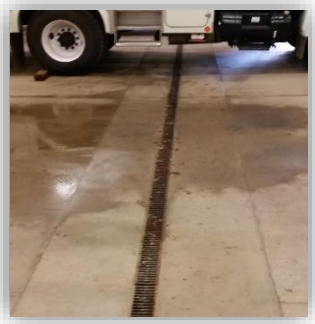


Figure 4 – Vehicle Wash/Maintenance Bay with Trench Drain

3.2 Good Housekeeping

The intent of good housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which helps to reduce the potential of pollution of storm water.

The following prevention measures shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights so they are easily accessed.
- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Make sure items are stored away from areas where the chance of an accident to occur is greater.
- Refill materials in secondary containments or indoors.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or nontoxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up drips and spills promptly.
- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.

3.3 Maintenance

It is important to properly inspect and maintain equipment, vehicles and systems, storm sewer, sanitary system, and oil/water separator associated with the City of Oberlin to detect potential issues that may cause pollutants to storm water. The storm sewer system shall be cleaned yearly or after major storm events. The oil/water separator shall be inspected quarterly and cleaned, to ensure that it works properly.

3.4 Spill Prevention and Response

Spill prevention and response shall be per the Oberlin Municipal Light and Power System Spill Prevention Containment and Control Plan which has been included in this report as Attachment E.

3.5 Erosion and Sediment Controls

All roads/drives, material storage and staging areas and parking lots are either concrete, gravel or recycled grindings to control erosion and potential offsite discharges of sediment. There is minimal green space on site which reduces the likeliness of any disturbed soil. If soil is disturbed, the area shall be seeded and mulched per ODNR's Rainwater and Land Development manual.

3.6 Management of Runoff

The site is drained through the use of storm sewer catch basins throughout the site, as shown in Attachment B. The storm water is routed through the on-site storm sewer and connects to the existing City of Oberlin MS4 at Outfall #1, Outfall #2, and Outfall #3 as shown in Attachment B.

Figure 5 – Typical Catch Basin

3.7 Salt Storage Piles or Piles Containing Salt

This site has no salt storage.

3.8 Sector-Specific Non-Numeric Effluent Limits

In addition to the prevention measures listed in the sections above, comply with applicable State and Federal laws, including Spill Prevention, Control and Countermeasure (SPCC) Plan requirements found in Appendix E. The following sector-specific measures shall be implemented:

Delivery Vehicles:

- Minimize contamination of storm water runoff from delivery vehicles arriving at the plant site.
- Inspect delivery vehicles arriving at the plant site and ensure overall integrity of the body or container and procedures to deal with leakage or spillage from vehicles or containers.

Fuel Oil Unloading Areas:

- Minimize contamination of precipitation or surface runoff from fuel oil unloading areas.
- Have personnel familiar with spill prevention and response procedures present during deliveries to ensure that any leaks or spills are immediately contained and cleaned up, and using spill and overflow protection devices (e.g., drip pans, drip diapers, or other containment devices placed beneath fuel oil connectors to contain potential spillage during deliveries or from leaks at the connectors).

Miscellaneous Loading and Unloading Areas:

- Minimize contamination of precipitation or surface runoff from loading and unloading areas.

Liquid Storage Tanks:

- Minimize contamination of surface runoff from above-ground liquid storage tanks.
- Maintain protective guards around tanks, containment curbs, spill and overflow protection, dry cleanup methods, or equivalent measures.

Large Bulk Fuel Storage Tanks:

- Minimize contamination of surface runoff from large bulk fuel storage tanks.
- Maintain secondary containment for bulk fuel storage tanks onsite.

Spill Reduction Measures:

- Minimize the potential for an oil spill or reference the appropriate part of your SPCC plan.
- Visually inspect as part of your routine facility inspection the structural integrity of all above-ground tanks, pipelines, pumps, and related equipment that may be exposed to storm water and make any necessary repairs immediately.

Residue-Hauling Vehicles:

- Inspect all residue-hauling vehicles for proper covering over the load, adequate gate sealing, and overall integrity of the container body.
- Repair vehicles without load covering or adequate gate sealing, or with leaking containers or beds.

Fueling Station:

- Maintain berm/dike around the fueling station to prevent stormwater from entering.
- Use dry cleanup methods.

Material Storage Areas:

- Maintain all storage vessels to prevent contamination of storm water.
- Store materials indoors or cover exposed materials with a roof or tarp.
- Install a berm/dike around the storage area's perimeter to prevent stormwater from entering.
- Use dry cleanup methods.

Stockpiling Areas:

- Cover stockpiles.
- Use appropriate sediment removal practices.

3.9 Employee Training

Successful storm water pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the City of Oberlin Municipal Light & Power System. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm drains, because the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain so that they understand the importance of preventing storm water pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel.
- New personnel will be required to review and understand this document prior to initiating work activities.
- Retraining will be completed, if violations continue to occur.
- Information material shall be displayed to remind workers of BMPs practices.
- Contractors working at the facility shall be required to complete Pollution Protection training

3.10 Non-Stormwater Discharges

The MS4 Permit prohibits discharges of anything but storm water into the MS4. Field Inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm drain are prohibited, including storm drain connections from indoor drains or sinks. These are known as illicit connections and must be eliminated. Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm drains, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures to help prevent non-storm water discharges will be implemented:

1. Provide well marked proper disposal or collection methods for solid or liquid waste.
2. Train employees in proper disposal of non-storm water discharges. Employees will be educated to understand that storm drains connect directly to waterways without treatment.
3. Label all storm drain inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm drain system.
4. Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-storm water discharges.
5. Periodically inspect and maintain storm drain inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm systems.
6. Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.

7. Check for possible pollutants at the storm water outfall locations and identify the pollutant to correct the situation.

3.11 Waste, Garbage and Floatable Debris

Solid waste dumpsters and garbage receptacles have been placed around the site and in the buildings for the collection of garbage. The lids must be kept closed on the outside receptacles. Employees are encouraged to keep the areas they are working in, clean and waste/garbage free. Catch basins and storm sewer systems shall be cleaned out on a regular basis. Waste material shall be picked up on a regular schedule, set by the City with additional picks ups as needed. Storage containers shall be inspected, yearly at a minimum, along with equipment and vehicles being used regularly. Stored vehicles and equipment shall be continuously inspected for leaks. Collected waste, garbage and debris will be removed and disposed of at approved locations.

3.10 Dust Generation and Vehicle Tracking of Industrial Materials

The drives and material storage and staging are covered with materials that control dust generation and eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

For the routine facility inspections and the comprehensive site inspections to be performed at your site, include a description of the following:

- The names of the person(s), or the positions of the person(s), responsible for inspection: The facility manager or a City of Oberlin representative.

- The schedules to be used for conducting inspections. Routine Facility Inspections are to be conducted quarterly, unless otherwise specified in Part 8 sector-specific requirements, and comprehensive site inspections are to be conducted annually: Routine facility inspections shall be performed once per calendar quarter, and comprehensive site inspections shall be performed once yearly. The comprehensive site inspection may be used for one of the routine inspections and

- Specific areas of the facility to be inspected, including schedules for specific outfalls: Routine facility inspections shall include inspection of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. fueling location, outdoor stockpiles, storage buildings/sheds, vehicles), and of all storm water control measures used on site (i.e. catch basins,, oil/water separator, gravel areas to ensure all areas are stabilized).

Comprehensive site inspections shall consist of an inspection of the entire site including all areas reviewed for routine facility inspections, areas where spills and leaks have occurred in the past three years, and a review of monitoring data collected by the quarterly visual assessments. Inspectors shall also examine the following:

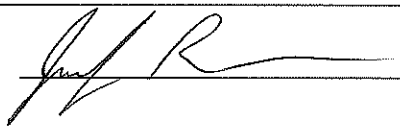
- Industrial materials, residue, or trash that may have or could come into contact with storm water
- Leaks or spills from industrial equipment, drums, tanks, and other containers
- Offsite tracking of industrial or waste material, or sediment where vehicles enter or exit the site
- Tracking or blowing of materials (including waste) from areas of no exposure to exposed areas
- Storm water control measures needing replacement, maintenance, or repair

Storm water controls measures shall be observed to ensure they are functioning correctly. If discharge locations are inaccessible, nearby downstream locations shall be inspected.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Jennifer Reeves Title: Stormwater Coordinator

Signature:  Date: 3/24/22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS

Date of Revision	Section	Description
6/5/2019	2.3	Outfall information added
6/5/2019	3.6	Outfall information added
6/5/2019	4	Outfall information added
6/5/2019	5	Outfall information added
8/19/2019	1.3	Contact information added
8/19/2019	2.2	Outfall information adjusted
8/12/2019	3.1	Vehicle wash information added
8/19/2019	3.6	MS4 connections adjusted
8/19/2019	3.8	Sector-specific information added
8/19/2019	4	Effluent limits added
8/19/2019	Attachment B	Storm/sanitary sewer adjustments
7/27/2021	1.1	Subsector code table updated for composting due to a permit change
7/30/2021	1.1	Adjusted the receiving water from the Oberlin MS4 to Plum Creek
11/9/2021	4.0	Visual inspection requirement removed.
3/21/2022	1.2	Updating Contact information
3/21/2022	1.3	Updating Stormwater Team

SWPPP ATTACHMENTS

Attachment A – General Location Map

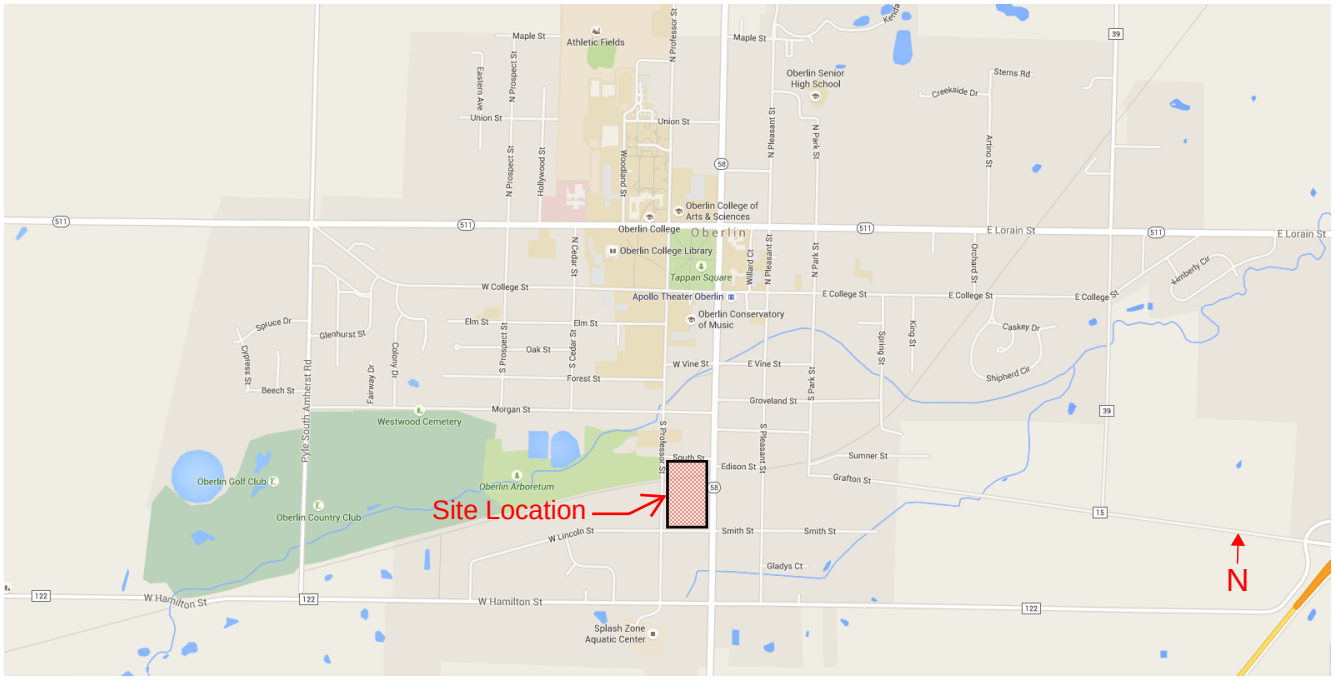
Attachment B – Site Map

Attachment C – Ohio EPA NPDES Permit #OHR000006

Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)

Attachment E – Oberlin Municipal Light and Power System Spill Prevention Containment and Control Plan

Attachment A – General Location Map



City of Oberlin Municipal Light and Power

Attachment B – Site Map

DRAFTED BY: K.E. McCARTNEY & ASSOCIATES INC. JOB TITLE: HY-_____ SHEET NAME: HY-_____15.dwg SCALE: 1 = 1 DATE: __/__/13

ATTACHMENT B

SITE PLAN
OBERLIN MUNICIPAL LIGHT & POWER SYSTEM

0 20 40 80
HORIZONTAL SCALE IN FEET

K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

Attachment C – Ohio EPA NPDES Permit #OHR000006

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

Attachment D – Inspection Forms

Comprehensive Site Inspection

Routine Facility Inspection

Miscellaneous Forms

NPDES Permit Tracking No.:
N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name:

2. NPDES Permit Tracking No.: N/A

3. Facility Physical Address:

a. Street:

b. City: c. State: d. Zip Code: -

4. Lead Inspectors Name: Title:

Additional Inspectors Name(s):

5. Contact Person: Title:

Phone: - - Ext. E-mail:

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
N/A

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:

N/A

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

N	/	A							

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
N/A

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ___ of ___ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: __/__/____

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: __/__/____

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
N/A

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Title:

Signature: Date Signed:

Oberlin Municipal Light and Power System
Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name			
NPDES Tracking No.			
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information

Weather at time of this inspection?
❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature:

Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No
If yes, describe:

Are there any discharges occurring at the time of inspection? ❑Yes ❑No
If yes, describe:

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
5		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	**Material loading/unloading and storage areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	**Equipment operations and maintenance areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	**Fueling areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	**Outdoor vehicle and equipment washing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	**Waste handling and disposal areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	**Erodible areas/construction**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	**Non-stormwater/ illicit connections**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	**Salt storage piles or pile containing salt**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
9	**Dust generation and vehicle tracking**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	**(Other)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	**(Other)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	**(Other)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Maintenance Form

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Attachment E – Oberlin Municipal Light and Power System Spill Prevention Containment and Control Plan

OBERLIN MUNICIPAL LIGHT AND POWER SYSTEM SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Latest Amendment: July 2020

Last Review Date: July 2020

Originally Prepared by: Randy Meyer, QEP #12010032
American Municipal Power-Ohio, Inc.
1111 Schrock Road, Suite 100
Columbus, Ohio 43229

A
SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN
FOR THE
OBERLIN MUNICIPAL LIGHT & POWER SYSTEM
OBERLIN, OHIO 44074

Originally Prepared By:

Randy Meyer, QEP #12010032
American Municipal Power-Ohio, Inc.
1111 Schrock Road, Suite 100
Columbus, Ohio 43229
Phone: 614/540-1111
Fax: 614/540-1081
Web Site:
E-Mail: rmeyer@ammpartners.org

PROFESSIONAL ENGINEER 40CFR 112.3(d) CERTIFICATION

I hereby certify that this plan was prepared by me or under my direct supervision and that I am a duly Registered Professional Engineer under the laws of the State of Ohio.
I certify that I or my agent have visited and examined the facility and being familiar with provisions of 40 CFR, Part 112, attest that this plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of this part. Procedures for required inspections and testing have been established, and this plan is adequate for the Oberlin Municipal Light and Power System. This certification shall in no way relieve the City of Oberlin of the responsibility to prepare and fully implement this Plan in accordance with 40 CFR Part 112.

Professional Engineer: Stephen Washburn

Signature: _____ Date: _____

P.E. Registration Number: Ohio E-58781

P.E. Stamp:

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1.0 INTRODUCTION

1.1 GENERAL APPLICABILITY - 40 CFR 112.1

The United States Environmental Protection Agency (EPA) has established regulations for oil pollution prevention in the Code of Federal Regulations, Title 40 (40 CFR), Chapter 1, Parts 110 through 112.

These regulations require that a Spill Prevention, Control, and Countermeasure (SPCC) Plan be prepared if it could reasonably be expected that a harmful quantity of oil could be discharged into the waters of the United States (Including sewer pathways). These regulations apply to facilities which have a total of 1,320 or more gallons of aboveground oil storage. Transformers containing mineral oil and other oil-filled electrical equipment with 55 gallons or more in capacity fall under the SPCC regulations. Storage capacity is defined to be the shell capacity of the container.

The regulations require that a report must be sent to the EPA regional administrator and the Ohio EPA (OEPA) within 60 days of a single spill of more than 1,000 gallons or two spills from the same facility within a year of 42 gallons or more. In the event of a release of oil that creates a sheen on a navigable waterway or a spill event of a 25 gallons or greater to the environment, you must notify OEPA within 30 minutes of discovery. Additionally, any release of oil that creates a sheen on a navigable waterway must be reported to the United States Coast Guard National Response Center. The EPA requires that a complete copy of the SPCC Plan be maintained at the site and utility office at all times. A Release/Spill Notification Form is included in Appendix A and must be sent to all relevant agencies listed if a spill of the magnitude described above occurs.

A spill or discharge is defined as any spilling, leaking, pumping, pouring, emitting, emptying or dumping of oil, except discharges in compliance with a permit under Section 402 of the Clean Water Act, into or upon the waters of the United States (WOTUS) or adjoining shorelines in harmful quantities. United States waters include rivers, lakes, streams, intermittent streams, mud flats, sand flats, wetlands and their tributaries and all waters affected by the tide. A harmful quantity is one in which the discharge of oil violates state

and federal water quality standards or causes a film, sheen, or discoloration of the surface of the water or adjoining shorelines or causes a sludge or emulsion to be deposited beneath the surface of the water or shoreline.

The notification form, included in Appendix A of this Plan, may be used for reporting a spill. The report should contain the identification of the facility, spill date, description, a copy of the Spill Prevention, Control, and Countermeasure (SPCC) Plan, cause, corrective action, and additional preventive measures that have been taken. The SPCC Plan must be reviewed and revised, if necessary, at least every five years and anytime there is a change in the facility design, construction, operational or maintenance that materially affects its potential for a discharge. Technical modifications to a facilities SPCC Plan require it to be recertified by a P.E., while non-technical or administrative modifications do not require P.E. certification. Unless a facility meets the requirements for self-certification, the EPA requires that the facilities initial SPCC Plan be reviewed and certified by a Registered Professional Engineer.

The EPA may levy fines of up to $5,000 per day if a spill reaches the waters of the United States.

2.0 FACILITY INFORMATION

Facility Name:	Oberlin Municipal Light & Power System
Street Address:	289 South Professor Street Oberlin, Ohio 44074 Facility coordinates are 41° 17' 18" north and 82° 13' 00" west
Owner:	City of Oberlin
Contacts:	Doug McMillan (Primary), OMLPS Director
	Drew Skolnicki, Technical Services Superintendent
	Steve Wilson, OMLPS Plant Superintendent
Telephone Number:	(440) 775-7260

2.1 FACILITY DESCRIPTION

The City of Oberlin, Ohio operates a publicly owned electric utility that is used for electrical generation and retail distribution, generally within the City limits of Oberlin, Ohio. The electrical generation facilities are located at 289 South Professor Street.

The power plant has six engine-generator sets that operate on Number 2 fuel oil or a combination of natural gas and Number 2 fuel oil. The plant has two 15,000-gallon above ground steel fuel oil tanks, and a 1,000 gallon lube oil tank located in a concrete diked area south of the power plant. The city has seven fuel oil day tanks of 300 to 1,000 gallons each, three lube oil tanks of 100 to 1,100 gallons, three lube oil coolers of 90 to 175 gallons each, one 150-gallon lube oil strainer, three dirty oil tanks of 330 to 650 gallons each, a waste oil tank of 2,000 gallons, approximately 24 lube oil 55-gallon drums, and two lube oil filters of 60 and 70 gallons, located within the power plant. The power plant basement serves as secondary containment for all storage tanks and filters listed above located within the plant, as all floor drains are plugged

Six transformers, containing greater than 55 gallons of mineral oil are located in the substation at the plant. There are also five voltage regulator banks (of three) for a total of fifteen containing between 95 and 149 gallons each. Additionally, the city utilizes a building (Building 'A') on the power plant site for storage of spare pad mount and pole mount transformers. Adjacent to the building containing the spare transformers is the old

transformer storage area where transformers are stored until such time they can be disposed of. It is possible for spills to reach Plum Creek by way of the storm sewers. The City Map in Appendix E of the plan shows the proximity of Plum Creek to the plant and substations. Although floor drains are plugged in the plant, there is a possibility that a spill could reach the sumps in the plant basement. In the unlikely event of a spill reaching the plant sumps, oil would then be routed through an Oil-Water Separator prior to discharge to the cities sanitary sewer system.

The electric utility operates five electric substations, only three of which contain 1,320 gallons or more of oil. They are located as shown on the site maps located in Appendix E. The Switch Station contains four circuit breakers containing 350 gallons of oil each. The Butternut Substation contains three voltage regulator banks (of three) for a total of nine that contain 137 to 172 gallons each, and one transformer of 2,600 gallons. There are additional pad mount transformers which are stored at the Butternut site (designated as 'spare transformers' in Appendix E substation drawing) that can be used as spares if another transformer is decommissioned. The Butternut substation spare transformers contain quantities of oil equal to or greater than 55 gallons, and may contain up to 10,000 gallons of additional capacity depending on the number of spares stored on site. The Oberlin Road Substation has a 1,980 gallon transformer, a spare 110 gallon voltage regulator, and three voltage regulator banks (of three) for a total of nine that contain 110 to 149 gallons each.

The SPCC Site Diagrams (Figures E.2 through E.7) show the location and contents of each tank, transformer, regulator, drum storage area, interconnecting pipes, drainage patterns, and spill cleanup material locations. The Facility Location Diagram (Figure E.1) identifies nearby roadways and waterways. These figures are included at the end of this Plan.

2.2 OIL STORAGE INFORMATION

Outdoor Tanks

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
B1 (South)	Bulk storage tank	Dike south of plant	15,000	2001	#2 Diesel	Concrete dike	Double wall fiberglass; below ground
B2 (North)	Bulk storage tank	Dike south of plant	15,000	2001	#2 Diesel	Concrete dike	Double wall fiberglass; below ground
LB1	Bulk storage tank	Dike south of plant	1,000	2001	Lube Oil	Concrete dike	Double wall fiberglass; below ground

Day Tanks

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
D1	Unit 1 Day Tank	Plant Basement	635	1948	#2 Diesel	Plant basement	Single wall steel
D2	Unit 2 Day Tank	Plant Basement	635	1941	#2 Diesel	Plant basement	Single wall steel
D3	Unit 3 Day Tank	Plant Basement	650	1934	#2 Diesel	Plant basement	Single wall steel
D5	Unit 5 Day Tank	Plant Basement	635	1951	#2 Diesel	Plant basement	Single wall steel
D6	Unit 6 Day Tank	Plant Basement	1000	1957	#2 Diesel	Plant basement	Single wall steel
D7	Unit 7 Day Tank	Plant Basement	300	1961	#2 Diesel	Plant basement	Single wall steel
D8	Unit 8 Day Tank	Plant Basement	650	1966	#2 Diesel	Plant basement	Single wall steel

Lube Oil Tanks

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
L1A	Unit 1 Lube Oil Tank	Plant Basement	100	2005	Lube Oil	Plant basement	Single wall steel
L4	Unit 4 Lube Oil Tank	Plant Basement	275	1997	Lube Oil	Plant basement	Single wall steel
L6/8	Unit 6 & 8 L.O. Tank	Plant Basement	1,100	1966	Lube Oil	Plant basement	Single wall steel

Lube Oil Coolers

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
LC1	Unit 1 L.O. Cooler	Plant Basement	175	1948	Lube Oil	Plant basement	Single wall steel
LC6	Unit 6 L.O. Cooler	Plant Basement	90	1957	Lube Oil	Plant basement	Single wall steel
LC8	Unit 8 L.O. Cooler	Plant Basement	100	1966	Lube Oil	Plant basement	Single wall steel

Lube Oil Filters

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
F6	Unit 6 Lube Oil Filter	Plant Basement	60	1957	Lube Oil	Plant basement	Single wall steel
F8	Unit 8 Lube Oil Filter	Plant Basement	70	1966	Lube Oil	Plant basement	Single wall steel

Lube Oil Strainers

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
S7	Unit 7 L.O. Strainer	Plant Basement	150	1961	Lube Oil	Plant basement	Single wall steel

Dirty Oil Tanks

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
DO1	Dirty Oil Tank	Plant Basement	585	--	Lube Oil	Plant basement	Single wall steel
DO2	Dirty Oil Tank	Plant Basement	650	--	Lube Oil	Plant basement	Single wall steel
DO5	Dirty Oil Tank	Plant Basement	330	--	Lube Oil	Plant basement	Single wall steel

Waste Oil Tank

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
WO7	Waste Oil Tank	Plant Basement	2000	--	Lube Oil	Plant basement	Single wall steel

Transformers / Voltage Regulators

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
GNT01	Generation Substation Transformer	North of plant	2400	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
PST01	Plant Substation Transformer	South of plant	2100	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
PST02	Plant Substation Transformer	South of plant	1070	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
PST03	Plant Substation Transformer	South of plant	720	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
WLR01a WLR01b WLR01c	Plant Substation Voltage Regulators	South of plant	137 each	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
FSR01a FSR01b FSR01c	Plant Substation Voltage Regulators	South of plant	149 each	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
ELR01a ELR01b ELR01c	Plant Substation Voltage Regulators	South of plant	149 each	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
PPT01	House Power Transformer	North of Plant	400	-	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
SD-T01	1,500 KVA Transformer	West of Plant	505	-	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
STA	Spare Transformer Storage Area	'A' Building East of Plant	2500	-	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
OTA	Old Transformer Storage Area	Adjacent to 'A' Building	500	-	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
SS12, 15, 16, 17	Switch Station Oil Circuit Breakers	Switch Station	350 each	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
BNT01	Butternut Substation Transformer	Butternut Substation	2,600	2003	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
FBR01 BCR01 BWR01	Butternut Substation Voltage Regulators	Butternut Substation	137 (3) 172 (3) 137 (3)	--	Mineral Oil	Concrete Diking	N/A
BSSTA	Butternut Substation Spare Transformers	Butternut Substation	Up to 10,000	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
PSR02a PSR02b PSR02c	Plant Substation Voltage Regulators	South of plant	110 each	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
PSR03a PSR03b PSR03c	Plant Substation Voltage Regulators	South of plant	95 each	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
ORT01	Oberlin Road Substation Transformer	Oberlin Road Substation	1980	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
IPR01a IPR01b IPR01c	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation	149 each	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A

IER01a IER01b IER01c	Oberlin Road Substation Voltage Regulator	Oberlin Road Substation	110 each	--	Mineral Oil	Oil Spill Contingency Plan. See Appendix D	N/A
APR01a APR01b APR01c	Oberlin Road Substation Voltage Regulator	Oberlin Road Substation	137 each	--	Mineral	Oil Spill Contingency Plan. See Appendix D	N/A

Lube Oil Drums

Tank ID No.	Description	Location	Capacity (Gal.)	Install Date	Product Stored	Secondary Containment	Piping
LD	Lube Oil Drums (Approximately 24 total)	Plant Basement	55	--	Lube Oil	Stored on containment pallets in basement. Drums not on pallets are provided secondary containment via building, plugged floor drains and O/W separator	N/A

2.3 TOTAL OIL STORAGE

34,505 gallons of No. 2 fuel oil.

8,005 gallons of engine lubricating oil.

30,621 gallons of mineral oil at the plant and remote substations.

3.0 IMPLEMENTATION

The SPCC plan will meet the following objectives when fully implemented.

1. Improve the facility operations so as to minimize the chance of a spill.
2. Provide adequate secondary containment to impound spilled material if the primary containment fails. An exception to this objective is any oil-filled equipment covered under the oil spill contingency plan included in Appendix D.
3. Train employees to follow proper procedures, both to minimize the chance of a spill and safely take corrective action in the event a spill occurs.

If a change in the facility design, construction, operation, or maintenance materially affects its potential for a discharge, the plan must be amended within six months and certified by a registered professional engineer. The SPCC Plan amendments must be implemented within six months of the amendments to the plan.

It is the responsibility of the owner to keep the SPCC Plan current, on file and available upon request by authorized officials. The owner must complete a review and evaluation of the SPCC Plan at least once every five years. The owner must document completion of the review and evaluation, and must sign a statement as to whether the plan will be amended.

The Owner must approve, sign and implement the SPCC Plan as soon as possible. The Owner is responsible for training utility employees whose jobs involve oil-handling activities in the procedures set forth in this Plan.

If the five year review indicates that more effective, field proven prevention and control technology is available and will significantly reduce the likelihood of a spill, the plan shall be

amended. The technologies shall be implemented as soon as possible, but no later than six months after the amendment to the plan.

4.0 SPCC PLAN REVIEW

Oberlin Municipal Light and Power is subject to the oil spill prevention, control and countermeasure planning regulations in Title 40, Code of Federal Regulations, Part 112. The following sections detail the plans for preventing oil spills. The plan also details plans for controlling and responding to oil spills in the unlikely event they occur.

4.1 MANAGEMENT APPROVAL – 40 CFR 112.7

This SPCC Plan amendment is fully approved by the management of Oberlin Municipal Light & Power System, and the necessary resources have been committed to implement the plan as described. The SPCC Plan dated July 2020 has been reviewed, and this amendment reflects the review as well as a tank retirement and additional transformer capacity at several OMLPS facilities.

_____ _____

Doug McMillan, Director Date

Note: Management of Oberlin Municipal Light & Power System has also documented this review in Section 7.0 SPCC PLAN REVIEW.

4.2 PAST SPILL EXPERIENCE

There have been no known spill events within twelve months prior to the last review/or amendment date for this plan, whichever is later.

4.3 POTENTIAL EQUIPMENT FAILURES – 40 CFR 112.7(b)

Bulk Storage Tanks B1 & B2			
Potential Event	Volume Released	Spill Rate	Spill Direction
Complete Tank Failure	15,000 Gallons	Instantaneous	Contained within dike.
Partial Tank Failure	Up to 15,000 Gallons	Gradual to instantaneous	Contained within dike.
Tank Overfill	1 to several gallons.	Up to 1 gallon per minute.	Fill catch basin.
Pipe Failure	Up to 15,000 gallons.	Up to 230 gallons per minute.	Outer containment pipe to plant basement to oil separator to sanitary sewer.
Leaking pipe or Valve Packing	Several ounces to several gallons.	Up to 1 gallon per minute.	Outer containment pipe to plant basement to oil separator to sanitary sewer.

Outdoor Lube Oil Tank			
Potential Event	Volume Released	Spill Rate	Spill Direction
Complete Tank Failure	1,000 Gallons	Instantaneous	Contained within dike.
Partial Tank Failure	Up to 1,000 Gallons	Gradual to instantaneous	Contained within dike.
Tank Overfill	1 to several gallons.	Up to 1 gallon per minute.	Fill catch basin.
Pipe Failure	Up to 1,000 gallons.	Up to 230 gallons per minute.	Outer containment pipe to plant basement to oil separator to sanitary sewer.
Leaking pipe or Valve Packing	Several ounces to several gallons.	Up to 1 gallon per minute.	Outer containment pipe to plant basement to oil separator to sanitary sewer.

Facility Product Unloading Area			
Potential Event	Volume Released	Spill Rate	Spill Direction
Tank Truck Leak or Failure	1 to 4000 gallons.	Gradual to Instantaneous.	Contained within bermed or curbed area.
Tank Truck Leak or Failure	1 to several gallons.	Up to 1 gallon per minute.	Contained within bermed or curbed area.

Day Tanks			
Potential Event	Volume Released	Spill Rate	Spill Direction
Complete Tank Failure	Up to 1000 Gallons	Instantaneous	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Partial Tank Failure	Up to 1000 Gallons	Gradual to instantaneous	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Tank Overfill	1 to several gallons.	Up to 1 gallon per minute.	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Pipe Failure	Up to 1000 gallons.	Up to 20 gallons per minute.	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Leaking pipe or Valve Packing	Several ounces to several gallons.	Up to 1 gallon per minute.	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.

Lube Oil Tanks, Filters and Strainers			
Potential Event	Volume Released	Spill Rate	Spill Direction
Complete Equipment Failure	Up to 1000 Gallons	Instantaneous	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Partial Equipment Failure	Up to 1000 Gallons	Gradual to instantaneous	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Container Overfill	1 to several gallons.	Up to 1 gallon per minute.	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Pipe Failure	Up to 1000 gallons.	Up to 20 gallons per minute.	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Leaking pipe or Valve Packing	Several ounces to several gallons.	Up to 1 gallon per minute.	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.

Indoor Waste Oil Tanks			
Potential Event	Volume Released	Spill Rate	Spill Direction
Complete Tank Failure	Up to 2000 Gallons	Instantaneous	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Partial Tank Failure	Up to 2000 Gallons	Gradual to instantaneous	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Tank Overfill	1 to several gallons.	Up to 1 gallon per minute.	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Pipe Failure	Up to 2000 gallons.	Up to 20 gallons per minute.	Basement: floor drains capped and curbs installed to contain oil. Sumps in basement lead to O/W Separator.
Leaking pipe or Valve Packing	Several ounces to several gallons.	Up to 1 gallon per minute.	Basement floor drains to oil separator to sanitary sewer. Sumps in basement lead to O/W Separator.

Transformers			
Potential Event	Volume Released	Spill Rate	Spill Direction After Implementation of Section 1.2
Complete Equipment Failure	Up to 2600 Gallons	Instantaneous	Oil Spill Contingency Plan. See Appendix D
Partial Equipment Failure	Up to 2600 Gallons	Gradual to instantaneous	Oil Spill Contingency Plan. See Appendix D

4.4 CONTAINMENT AND DIVERSIONARY STRUCTURES – 40 CFR 112.7(c)(1)

The facility has the required containment and/or diversionary structures to prevent discharged oil from reaching navigable water. The preventive systems are described below:

1. Dikes and berms, sufficiently impervious to contain spilled oil around bulk tanks, portable containers with capacities greater than 55 gallons, and product unloading area.
2. Curbing is provided.
3. Oil booms are available at the facility. Sand bags are available with the City of Oberlin for emergency use.
4. Sorbent materials are available at the facility.

The owner has quick access to a source of oil booms to span Plum Creek and enough pillows, pads, and sheets to absorb a 100-gallon spill. The owner also has quick access to oil barrels, a portable oil pump, and various vehicles. Discharge sources and associated containment/diversionary structures in place at the facility are described in Section 2.3 of this SPCC Plan.

4.5 DEMONSTRATION OF PRACTICABILITY – 40 CFR 112.7(d) and 40 CFR 112.7(k) QUALIFIED OIL-FILLED OPERATIONAL EQUIPMENT

Facility management has determined that use of containment and diversionary structures or readily available equipment to prevent discharged oil from reaching navigable waters is practical and effective at this facility.

40 CFR, Section 112.7(k) allows oil-filled electrical equipment to forego secondary containment if the City of Oberlin has had no single discharge as described in Section 112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in Section 112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC plan certification date. In lieu of secondary containment for oil-filled electrical equipment meeting the above qualification, the City of Oberlin has done the following:

(1) Establish and document the facility procedures for inspections or a monitoring program to detect equipment failure and/or a discharge;
(2) Provide in the SPCC Plan an oil spill contingency plan following the provisions of 40 CFR, Section 109; and
(3) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Oberlin will implement the inspection program as described in Appendix B. The inspection program is designed to provide early detection of equipment failures and/or oil discharges.

An oil spill contingency plan consistent with the technical requirements of 40 CFR, Section 109 is provided in Appendix D. Oberlin has also provided a written commitment of manpower, equipment, and materials required to adequately respond to any quantity of oil that may be discharged.

4.6 FACILITY DRAINAGE – 40 CFR 112.8(b)(1)

1. Drainage from diked or bermed storage areas (including the bermed fuel unloading area) is restrained by valves to prevent a spill or other excessive leakage of oil into the storm water drainage system. The storm drain located just outside of the bermed unloading area flows through underground piping to Plum Creek. The valve is kept closed during unloading activities. All basement floor drains are curbed, plugged, or drain into a sump. The drainage in the sump is pumped through an oil/water separator prior to entering the Oberlin sanitary sewer system.
2. Gate valves are used to drain diked and bermed areas and shall be manually activated.

3. In the event of a spill from a tank, the oil will be contained within a dike, bermed area, plant basement, or in the OWS.
4. There are no in-plant ditches at the facility.
5. Facility drainage systems are adequately engineered to prevent oil from reaching navigable water in the event of equipment failure or human error.

4.7 BULK STORAGE TANKS – 40 CFR 112.8(c)(1-3)

The facility utilizes two 15,000-gallon aboveground storage tanks, six indoor fuel oil day tanks, lubricating oil tanks, six lubricating oil coolers, eight lube oil strainers, a 2,000- gallon waste oil tank, and two dirty oil tanks for its operation.

1. All tanks utilize materials and construction that are compatible with the oils they contain and the conditions of storage.
2. Means of secondary containment are provided for all tanks.
   A. The 15,000 gallon bulk fuel tanks are located within a dike that provides adequate secondary containment. The containment area is sized to contain the entire contents of the largest tank plus sufficient freeboard allowance for precipitation.
   B. The tank truck unloading area utilizes a berm, surrounding the area. The containment area is sized to contain the entire contents of the largest truck tank compartment plus sufficient freeboard allowance for precipitation. (This is no longer required by the regulations but is a best practice.)
   C. Secondary containment for the day tanks, waste oil tank, and dirty oil tanks is the plant basement. If there is an event in which oil is discharged onto the floor, the oil will be contained within the basement or diked areas since all floor drains have been plugged. In the unlikely event that a spill would circumvent a diked area, the spill would then drain into sumps that flow to an oil/water separator. After removal of oil, water from the separator is discharged into the sanitary sewer system.

3. Rain water will be drained from any diked areas, complying with the following requirements:
    A. The discharge valve is normally sealed (locked) closed.
    B. Runoff water is inspected to ensure compliance with applicable water quality standards and will not cause harmful discharge into navigable waters.
    C. The valve is opened and resealed under direct supervision.
    D. Records are kept of drainage events. (Refer to Appendix B).
4. There are no buried metallic storage tanks at the facility.
5. There are no partially buried metallic storage tanks at the facility.
6. Aboveground tanks will be tested periodically using a combination of visual inspections and radiographic, hydrostatic, radiographic, ultrasonic, acoustic emissions, or another system of non-destructive shell thickness testing where required. The time interval between inspections and type of testing shall be based on good engineering practice, considering container size and design, and generally accepted industry standards, such as the Steel Tank Institute (STI), SP001 standard. Comparison records will be maintained. Visual inspections will be performed monthly and will include inspection of all tank supports and foundations. Annual tank inspections will also be performed in conjunction with the STI-SP001 standard. Template inspection forms can be found in Appendix B. Records of each inspection will be kept on file at the facility.
7. There are no internal heating coils at the facility.
8. All day tanks are equipped with level indicators. All bulk tanks have high level alarms or direct vision gauges. The liquid level sensing devices are regularly tested to ensure proper operation.
9. No plant effluents are directly discharged into navigable waters. Any effluents leaving the plant would be captured by an Oil-Water Separator that is inspected/serviced four times a year. Sumps that pump to the Oil-Water Separator are checked daily.
10. Oil leaks which result in a loss of oil from tank seams, gaskets, piping, pumps, valves, rivets and bolts are promptly corrected. Accumulations of oil in diked areas are promptly removed.

11. Mobile or portable oil storage containers (including 55 gallon drums) are placed in a location that provides secondary containment sufficient to contain the capacity of the largest single compartment or container.

4.8 FACILITY TRANSFER OPERATIONS, PUMPING 40 CFR 112.8(d)(1-5)

1. The piping from the 15,000-gallon steel aboveground tanks and the 1,000 gallon lube oil tank is underground steel pipe with an outer jacket of fiberglass, for secondary containment. All underground piping is sloped towards the plant basement for leak detection purposes.
2. Pipelines not in service for an extended period of time, are capped and marked as to their origin.
3. All pipe supports are properly designed to minimize abrasion and corrosion and to allow for expansion and contraction.
4. All aboveground pipelines and valves are examined monthly to assess their condition. During the inspection the general condition of flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces are examined.
5. Warning signs are posted as needed to prevent vehicles from damaging aboveground pipelines.

4.9 FACILITY TANK TRUCK UNLOADING 40 CFR 112.7(h)(1-3)

1. The tank truck unloading procedures meet the minimum requirements of the U.S. Department of Transportation.
2. The fuel oil tank truck fills the storage tank from within a bermed area. Prior to fuel unloading, the drainage valve is manually closed. The bermed area is designed to hold the volume of fuel contained in the largest compartment of the tank truck
3. Warning signs and wheel chock blocks are provided at the unloading area to prevent premature vehicular departure.

4. The lower most drains and all outlets on tank trucks are to be closed and inspected for leaks prior to filling and departure.

Unloading and Handling of 55 Gallon Drums

1.) Drums are brought in the building through the shop overhead door.
2.) Drum Dollies are used to take the drums to a drop off location near the plant basement.
3.) Drums are lowered into the basement using an overhead crane and drum lifting tool.

4.10 INSPECTIONS AND RECORDS – 40 CFR 112.7(e)

Monthly visual inspections consist of a complete walk through at each facility to check for tank/equipment damage or leakage, stained or discolored soils, excessive accumulation of water in diked areas and to ensure dike drain valves are securely closed and locked. Annual tank inspections are conducted in accordance with the STI-SP001 standard.

The inspection logs provided in Appendix B will be used during Monthly and Annual inspections. These inspections are performed in accordance with written procedures developed for the facility. Written inspection procedures and Monthly inspections are signed by the inspector or supervisor and kept with the SPCC Plan under usual and customary business practices for at least five years.

4.11 SECURITY – 40 CFR 112.7(g)(1-5)

1. The facility power plant and substations are located within a fenced area that is locked while unattended.
2. Drain valves are locked in the closed position when in non-operating status.
3. The starter controls for all oil pumps are locked in the off-position located at the facility at a site accessible only to authorized personnel.
4. The loading and unloading connections of oil pipelines are capped when not in service.

5. The plant and transformer substations are lit by security lights to aid in the detection of spills during periods of darkness and prevent discharges occurring through acts of vandalism.

4.12 PERSONNEL, TRAINING AND SPILL PREVENTION PROCEDURES – 40 CFR 112.7(f)(1-3)

1. Facility personnel are instructed by management in the operation and maintenance of oil pollution prevention equipment discharge procedure protocols and pollution control laws, rules and regulations, general facility operations, and the contents of the SPCC Plan.
2. The facility manager, Doug McMillan, is accountable for oil spill prevention at the Oberlin Municipal Light & Power System.
3. Spill prevention meetings are conducted annually to assure understanding of this Plan. Such briefings must highlight and describe known discharges or failures, malfunctioning components, and any recently developed precautionary measures. The record of Spill Prevention Meetings and Trainings Form in Appendix B may be used for this purpose. Personnel are encouraged to offer suggestions that would be beneficial to spill prevention. New employees shall receive spill prevention training as part of their initial training in plant operation if they have oil handling duties.

4.13 EMERGENCY TELEPHONE NUMBERS

1. Notification Procedures

   A. Facility Emergency Coordinator,

   Doug McMillan (440) 775-7260

   Alternate Emergency Coordinator,

   (Plant) Steve Wilson (440) 775-7260

   (Substations) Drew Skolnicki (440) 776-4822

   B. Ohio SERC (800) 282-9378

   C. U.S. Coast Guard National Response Center (800) 424-8802

   D. Lorain County LEPC (440) 329-5117

   24 Hour (440) 322-5888

   E. Oberlin Fire Department (440) 774-3211

2. Clean-up Contractors/Supplies and Equipment

   A. Inland Waters
   2195 Drydock Avenue
   Cleveland, Ohio 44113
   (800) 869-3949

   B. Veolia Environmental Services
   N936 Craftsmen Drive, Unit B
   Greenville, WI 54952
   (800) 688-4005 (24 hour)

   C. U.S.T. Environmental
   8374 Lancaster-Newark Road
   Baltimore, Ohio
   (800-878-1727)

5.0 EMERGENCY SPILL PROCEDURES

1. Call 911 if emergency fire or rescue equipment is needed.
2. Determine the source of the leak.
3. Take corrective action to stop the leak if possible. (i.e. close valve, plug hole, etc.)
4. Report leak immediately to superintendent or person in charge.
5. Determine size of spill, rate of leakage, and direction of flow.
6. If a fuel oil tank or a transformer fails, place sand bags and sorbent materials around the area of the spill.
7. If a spill reaches the storm sewer, place oil booms at the outlet of the storm sewer into Plum Creek to prevent migration of the spill.
8. Take appropriate action to warn others and to prevent injury from possible fire.
9. If the spill is greater than 25 gallons and migrates off site or into the environment, or reaches navigable waters and results in a visible sheen, report the spill to the Ohio Environmental Protection Agency (OEPA) 800/282-9378 within 30 minutes of discovery.
10. If the spill reaches navigable waters, call the United States Environmental Protection Agency National Response Center 1-800-424-8802 or 1-312-353-2318.
11. Call the Lorain County Local Emergency Planning Commission (LEPC) at (440) 329-5117 or (440) 322-5888 (24-Hr).

The Superintendent or person in charge shall organize personnel to:

1. Safely attempt to stop the source of the leak.
2. Prevent the leak from migrating.
3. Clean up the spill.

If a berm fails or the spill flows over a berm, releasing fuel oil onto the ground, it is likely that some of the fuel would reach the storm sewers before the spill could be contained. This spill can be intercepted at the storm sewer outlet using oil booms and sorbent materials to help skim and contain the spill.

6.0 OIL DISPOSAL

All oil, oil-impacted soil, and materials used in the spill cleanup must be disposed of in accordance with USEPA and Ohio EPA regulations. Oil can be either pumped into appropriate size containers or, if a large spill occurs, pumped into an oil tanker. Residual oil can be cleaned up with sorbent pillows, sorbent sheets, or straw. Any contaminated soil should be removed and disposed of in accordance with USEPA and Ohio EPA regulations.

7.0 5-YEAR SPCC PLAN REVIEW – 40 CFR 112.5(b)

I have completed review and evaluation of the SPCC plan for Oberlin Municipal Light & Power system on _____ and _____ amend the plan as a result.
(Date) (will / will not)

_____
(Signature)

I have completed review and evaluation of the SPCC plan for Oberlin Municipal Light & Power system on _____ and _____ amend the plan as a result.
(Date) (will / will not)

_____
(Signature)

I have completed review and evaluation of the SPCC plan for Oberlin Municipal Light & Power system on _____ and _____ amend the plan as a result.
(Date) (will / will not)

_____
(Signature)

I have completed review and evaluation of the SPCC plan for Oberlin Municipal Light & Power system on _____ and _____ amend the plan as a result.
(Date) (will / will not)

_____
(Signature)

I have completed review and evaluation of the SPCC plan for Oberlin Municipal Light & Power system on _____ and _____ amend the plan as a result.
(Date) (will / will not)

_____
(Signature)

I have completed review and evaluation of the SPCC plan for Oberlin Municipal Light & Power system on _____ and _____ amend the plan as a result.
(Date) (will / will not)

_____
(Signature)

I have completed review and evaluation of the SPCC plan for Oberlin Municipal Light & Power System on _____ and _____ amend the plan as a result.
(Date) (will / will not)

_____
(Signature)

CROSS REFERENCE SHEET

Rule Citation	Description of Rule	Page in SPCC	Section in SPCC
§112.7	General requirements for SPCC Plans for all facilities and all oil types.	1-2, 12-13	1.0, 1.1, 3.0 4.0, 4.1, 4.2
§112.7(a)	General requirements; discussion of facility's conformance with rule requirements; deviations from Plan requirements; facility characteristics that must be described in the Plan; spill reporting information in the Plan; emergency procedures	3-12, 25-26	2.0, 2.1, 2.2, 2.3, 4.13, 5.0
§112.7(b)	Fault analysis	14-17	4.3
§112.7(c)	Secondary containment	18	4.4
§112.7(d)	Demonstration of Practicability	18-19	4.5
§112.7(e)	Inspections, tests and records	23	4.10
§112.7(f)	Employee training and discharge prevention procedures	24	4.12
§112.7(g)	Security (excluding oil production facilities)	23-24	4.11
§112.7(h)	Loading/unloading (excluding offshore facilities)	22-23	4.9
§112.7(l)	Brittle fracture evaluation requirements	N/A	Field Built Tank
§112.7(j)	Conformance with State requirements	Appendix	Appendix
§112.7(k)	Qualified oil-filled operational equipment	18-19	4.5
§112.8(b)	Facility drainage	19-20	4.6
§112.8(c)	Bulk storage containers	20-21	4.7
§112.8(d)	Facility transfer operations, pumping, and facility process	22	4.8

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION

Facility Name: Oberlin Municipal Light & Power System

Facility Address: 289 South Professor Street
Oberlin, Ohio 44074

1. Does the facility have a maximum storage capacity greater than or equal to 42,000 gallons and do the operations include over water transfers of oil to or from vessels?
Yes_____ No X

2. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility without secondary containment for each aboveground storage area sufficiently large enough to contain the capacity of the largest aboveground storage tank within the storage area?
Yes_____ No X

3. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula[1] considered acceptable by the RA) such that a discharge from the facility could cause injury to an environmentally sensitive area?
Yes_____ No X

4. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III or an alternative formula[1] considered acceptable by the RA) such that a discharge from the facility would shut down a public drinking water intake?
Yes_____ No X

5. Does the facility have a maximum storage capacity greater than or equal to one million (1,000,000) gallons and within the past five years, has the facility experienced a reportable spill in an amount greater than or equal to 10,000 gallons?
Yes_____ No X

[1] If an alternative formula is used, documentation of the reliability and analytical soundness of the alternative formula must be attached to the form.

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature: _____

Name: **Doug McMillan** **Title:** **OMLPS Director**

Date: _____

DISCHARGE NOTIFICATION FORM (40 CFR 112.4)

Oberlin Municipal Light & Power System
289 South Professor Street
Oberlin, OH 44074

Date _____

Name of Person preparing this report _____

Date of spill _____ Time of spill _____

Location of spill (include topographic maps and floors diagrams as needed) _____

_____

Date and time of OEPA notification – (800)282-9378 _____

Name of person contacted at OEPA _____

Date of time EPA National Response Center was notified – (800) 424-8802.

_____

Note: Contact the EPA if a single spill of more than 1000 gallons or 42 or more gallons in each of two discharges within any 12-month period)

Name of person contacted at the EPA _____

Has contamination reached U.S. waterways? If so, name of receiving body of water _____

_____

Material and amount released _____ gallons of _____

Probable cause of spill _____

Corrective actions and countermeasures taken to contain and clean up the spill (include equipment repairs and replacements) _____

Name of person who discovered the spill _____

Telephone number _____

Name of person in charge of the cleanup _____

Telephone number _____

Maximum storage or handling capacity of facility _____

Normal daily throughput _____

The cause of the spill, including a failure analysis of the system or subsystem in which the failure occurred _____

Additional preventive measures taken or contemplated to minimize the possibility of reccurrence _____

_____

If Oberlin has had a single discharge exceeding 1,000 U.S. gallons or two discharges exceeding 42 gallons within any twelve month period,

Send this Form with a copy of the SPCC Plan to:

Ohio EPA – DERR-ER
ATTN: ER Records Mgmt. SERC Report
122 South Front Street
PO Box 1049
Columbus, OH 43215-1049

United States Environmental Protection Agency
Region V
230 Dearborn Street
Chicago, IL 60604

SPCC Inspection Procedures

The purpose of this inspection program is to prevent the release of oil products used by the Oberlin Municipal Light and Power System into the environment. Releases of oil products can result in serious environmental damage, contamination of public water supplies, human health and safety hazards and damage to our electric system.

1. All inspections shall be conducted in a safe, workman-like manner.

2. Unless otherwise authorized by a supervisor/manager, inspections shall be performed as scheduled.

3. All observations and corrective actions taken shall be documented in writing and signed by the inspector and supervisor. Documentation shall be supplemented with photographs, diagrams and other supporting data if requested by the supervisor.

4. All uncontrolled oil leaks and spills shall be reported immediately to a supervisor by telephone or radio communication.

5. Inspection records shall be kept at least five years. Inspection records shall be maintained in or near the SPCC Plan and be readily available for inspection.

PLANT BASEMENT AND DIKED AREA SECONDARY CONTAINMENT
STANDING WATER DRAINAGE LOG

Date:_____ Time:_____

Standing water found to be free of oil contamination **(yes/no)**_____

Drainage performed by:_____ Title:_____

Containment area drained:_____

Method used for draining:_____

Volume Drained:_____

Date:_____ Time:_____

Standing water found to be free of oil contamination **(yes/no)** _____

Drainage performed by:_____ Title:_____

Containment area drained:_____

Method used for draining:_____

Volume Drained:_____

Date:_____ Time:_____

Standing water found to be free of oil contamination **(yes/no)** _____

Containment area drained:_____

Method used for draining:_____

Volume Drained:_____

RECORD OF SPILL PREVENTION BRIEFINGS AND TRAININGS

Instructions: Briefings will be scheduled and conducted by the owner or operators for operating personnel at intervals frequent enough to assure adequate understanding of the SPCC plan for this facility. These briefings should also highlight and describe known spill events or failures, malfunctioning components, and recently developed precautionary measures. Personnel will also be instructed in operation and maintenance of equipment to prevent the discharges of oil and applicable pollution control laws, rules and regulations. During these briefings there will be an opportunity for facility operators and other personnel to share recommendations concerning health, safety, and environmental issues encountered during operation of the facility.

Date: _____

Attendees: _____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Subjects and Issues: _____

_____

_____

_____

Recommendations and Suggestions: _____

_____

_____

MONTH_____ YEAR_____

OBERLIN MUNICIPAL LIGHT AND POWER SYSTEM

OIL INSPECTION LOG SHEET

<table>
<tr><td rowspan="3">WEEKLY</td><td colspan="3"></td><td colspan="4">Complete Weekly Log Sheet*</td></tr>
<tr><td colspan="2"></td><td>Week 1</td><td>Week 2</td><td>Week 3</td><td>Week 4</td></tr>
<tr><td>Visually inspect the oil system (See Weekly Log Sheet)</td><td>Date ___

Inspected By ____</td><td>____

____</td><td>____

____</td><td>____

____</td><td>____

____</td></tr>
<tr><td>MONTHLY (SEE NOTE 1)</td><td colspan="6">Inspect the monitoring devices (See Note 1) Measure the level of fuel in the bulk storage tanks. Date ____
Completed by_____ Last month's measured volume ____
gal._____ (minus) - _____
Last months usage_____
=
Total calculated volume_____

Compare to:
Total measured volume_____
If volumes differ by more than 2%, investigate for possible leaks and remeasure tank volume.</td></tr>
<tr><td>ANNUALLY</td><td colspan="6">Summarize any internal tank or piping inspections completed during the year and keep in your files.
Check monitoring, detection and warning equipment.</td></tr>
<tr><td>EVERY FIVE YEARS</td><td colspan="6">Revise SPCC plan every three five years or sooner if any changes are made to the oil storage system. (See Note 2)
Date of Last Revision _____</td></tr>
<tr><td>EVERY TEN YEARS or an interval recommended by the prior test report, whichever is shorter.</td><td colspan="6">Integrity test each aboveground Container at least once every ten Years or at a duration recommended by the prior test report, whichever Is shorter. Include the list of tanks of tanks from the check-off from the prior spreadsheet. Internal testing shall be conducted as outlined in Section 4.6, of the Item 6 SPCC Plan.
Date of Last Revision _____</td></tr>
</table>

_____ _____ _____

Signature Date Title

NOTES FOR OIL INSPECTION LOG SHEET

1. Monthly inspection of monitoring devices shall include the alarms associated with the diesel fuel system. Consult the operating manual for the testing methods recommended. The level of the fuel in the bulk storage tank shall be measured and recorded. The sorbent material shall be inventoried.
2. The SPCC plan must be reviewed every five years or sooner if changes have been made to any oil storage system. The review can be done by utility personnel if no changes have been made, otherwise a registered professional engineer is required to complete the review. Keep log sheets on file for five years.
3. Report any abnormalities to plant superintendent.

***ATTACH WEEKLY LOG SHEETS TO THIS FORM.**

Oil Filled Electrical Equipment Monthly Inspection Sheet - Substations & Additonal Transformers

Verify all inspection items with a checkmark, and any non-conformance with the * symbol. Note the non-conformance and corresponding corrective action in the remarks section.

			Power Plant Substation						Switch Station	Oberlin Road Substation			Butternut Road Substation		
			GNT01, & PPT01	SDT01	PST01, PST02, PST03	WLR01a-c, FSR01a-c, ELR01a-c, PSR02a-c, PSR03a-c	Spare Transformer Area	Old Transformer Area	SS12, SS15, SS16, SS17	ORT01	IPR01a-c, IER01a-c, APR01a-c, Spare regulator	SDT02	BNT01	BCR01a-c, BWR01a-c, FBR01a-c,	Spare Transformer Area
OIL FILLED EQUIPMENT INSPECTION ITEM															
	Visual Inspection														
	1	Paint Blistering													
	2	Rust on Oil-Filled Electrical Equipment													
	3	Paint Discloration													
	4	Sign of Leakage/Seeps/Weeps													
	5	Odors													
	6	Dead or Dying Vegetation													
	7	Sign of Leakage/Seeps/Weeps													
	8	Puddles containing spilled or leaked material													
	9	Water in Secondary Containment	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A		N/A

SITE SPECIFIC INSPECTION ITEMS				
	Security	Fencing, gates, locks, lighting functional?	Y	N
		Signs of Vandalism on site?	Y	N
	Spill Materia	Adequate Spill response materials available	Y	N
	Other	Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC Plan?	Y	N

INSPECTOR: _____

DATE: _____

Signature: _____

REMARKS:

Bulk Tanks and Oil Filled Electrical Equipment Monthly Inspection Sheet - Power Plant

Verify all inspection items with a checkmark, and any non-conformance with the * symbol. Note the non-conformance and corresponding corrective action in the remarks section.

			B1 & B2 & LB1	D1, D2, D3, D5, D6, D7, & D8	L1A	LC1	DO1	L4	DO5	LC6	F6	LC8	F8	S7	L6/8	WO7	DO2
TANK INSPECTION ITEM																	
	Visual Tank Inspection																
		1	Paint Blistering														
		2	Rust on Tanks or Piping														
		3	Paint Discloration														
		4	Sign of Leakage/Seeps/Weeps														
		5	Odors														
		6	Dead or Dying Vegetation														
		7	Tank Level (Gallons)														
		8	Bolts, rivets, or seams damaged														
		9	Vents are obstructed														
	Tank Dike, Supports and Foundations																
		1	Cracks or Corrosion														
		2	Discloration														
		3	Signs of Tank Settling														
		4	Primary Tank/Containment free of water														
	Piping and Associated Equipment																
		1	Paint Blistering														
		2	Corrosion of Equipment														
		3	Piping Leaks														
		4	Valve Stem/Flauge Leakage														
		5	Broken or Flange Sagging Piping														
		6	Odors														
		7	Pipeline Supports														
		8	Locked Valves														
		9	Tank liquid level gauge legible and in working condition														
	Secondary Containment																
		1	Base Integrity of Containment														
		2	Vegetation Present in Containment Area														
		3	Inspect holding tank for signs of leakage														
		4	Secondary containment for Piping - Signs of Leakage														
		5	Valves Locked														
		6	Vacuum Gauge Functioning														
		7	Accumulation of Oil														
SITE SPECIFIC INSPECTION ITEM																	
	Security		Fencing, gates, locks, lighting functional?	Y	N												
			Signs of Vandalism on site?	Y	N												
	Spill Materials		Adequate Spill response materials available on site?	Y	N												
	Other		Are there other conditions that should be addressed for continued safe operation or that may affect the site SPCC Plan?	Y	N												
	Drums		Are all drums within designated storage area?	Y	N												
			Drum storage area free of excess liquid, debris, cracks, or other fire hazards?	Y	N												
			Is the drum/container free of leaks?	Y	N												
			Is the drum/container free of distortions, buckling, denting or bulging?	Y	N												

INSPECTOR: _____ DATE: _____ Signature: _____

REMARKS:

Tank/Container ID	Description	Location
B1 (South Tank)	15,000 Gallon Diesel Storage Tank	Concrete Dike South of Plant
B2 (North Tank)	15,000 Gallon Diesel Storage Tank	Concrete Dike South of Plant
LB1	1,000 Gallon Lube Oil Tank	Concrete Dike South of Plant
D1	Engine 1 Day Tank	Plant Basement
D2	Engine 2 Day Tank	Plant Basement
D3	Engine 3 Day Tank	Plant Basement
D5	Engine 5 Day Tank	Plant Basement
D6	Engine 6 Day Tank	Plant Basement
D7	Engine 7 Day Tank	Plant Basement
D8	Engine 8 Day Tank	Plant Basement
L1A	Unit 1 Lube Oil Tank	Plant Basement
LC1	Unit 1 Lube Oil Cooler	Plant Basement
DO1	Unit 1? Dirty Oil Tank	Plant Basement
L4	Unit 4 Lube Oil Tank	Plant Basement
DO5	Dirty Oil Tank	Plant Basement
LC6	Unit 6 Lube Oil Cooler	Plant Basement
F6	Unit 6 Lube Oil Filter	Plant Basement
LC8	Unit 8 Lube Oil Cooler	Plant Basement
F8	Unit 8 Lube Oil Filter	Plant Basement
S7	Unit 7 Lube Oil Strainer	Plant Basement
L6/8	Unit 6 & 8 Lube Oil Tank	Plant Basement
WO7	Waste Oil Tank	Plant Basement
DO2	Dirty Oil Tank	Plant Basement
LD	Lube Oil Drums (Approximately 24 total)	Power Plant (Basement & Main Floor)

Tank/Container ID	Description	Location
GNT01	Generation Substation Transformer	North of plant
PPT01	House Power Transformer	North of plant
SDT01	1,500 KVA Transformer	East of plant
PST01	Plant Substation Transformer	South of plant
PST02	Plant Substation Transformer	South of plant
PST03	Plant Substation Transformer	South of plant
WLR01a	Plant Substation Voltage Regulators	South of plant
WLR01b	Plant Substation Voltage Regulators	South of plant
WLR01c	Plant Substation Voltage Regulators	South of plant
FSR01a	Plant Substation Voltage Regulators	South of plant
FSR01b	Plant Substation Voltage Regulators	South of plant
FSR01c	Plant Substation Voltage Regulators	South of plant
ELR01a	Plant Substation Voltage Regulators	South of plant
ELR01b	Plant Substation Voltage Regulators	South of plant
ELR01c	Plant Substation Voltage Regulators	South of plant
PSR02a	Plant Substation Voltage Regulators	South of plant
PSR02b	Plant Substation Voltage Regulators	South of plant
PSR02c	Plant Substation Voltage Regulators	South of plant
PSR03a	Plant Substation Voltage Regulators	South of plant
PSR03b	Plant Substation Voltage Regulators	South of plant
PSR03c	Plant Substation Voltage Regulators	South of plant
STA	Spare Transformer Area	A' Building Southeast of Plant
OTA	Old Transformer Area	Across from 'A' Building Southeast of Plant
SS12	Switch Station Oil Circuit Breakers	Switch Station
SS15	Switch Station Oil Circuit Breakers	Switch Station
SS16	Switch Station Oil Circuit Breakers	Switch Station
SS17	Switch Station Oil Circuit Breakers	Switch Station
BNT01	Butternut Substation Transformer	Butternut Substation
BSTA	Butternut Substation Spare Transformer Area	Butternut Substation
BCR01a	Butternut Substation Voltage Regulators	Butternut Substation
BCR01b	Butternut Substation Voltage Regulators	Butternut Substation
BCR01c	Butternut Substation Voltage Regulators	Butternut Substation
BWR01a	Butternut Substation Voltage Regulators	Butternut Substation
BWR01b	Butternut Substation Voltage Regulators	Butternut Substation
BWR01c	Butternut Substation Voltage Regulators	Butternut Substation
FBR01a	Butternut Substation Voltage Regulators	Butternut Substation
FBR01b	Butternut Substation Voltage Regulators	Butternut Substation
FBR01c	Butternut Substation Voltage Regulators	Butternut Substation
BST01	Butternut Substation Spare Transformer (GE 1500 KVA)	Butternut Substation
BST02	Butternut Substation Spare Transformer (GE 750 KVA)	Butternut Substation
BST03	Butternut Substation Spare Transformer (GE 1000 KVA)	Butternut Substation
ORT01	Oberlin Road Substation Transformer	Oberlin Road Substation
IPR01a	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
IPR01b	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
IPR01c	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
IER01a	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
IER01b	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
IER01c	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
APR01a	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
APR01b	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
APR01c	Oberlin Road Substation Voltage Regulators	Oberlin Road Substation
Spare regulator	Oberlin Road Spare Voltage Regulator	Oberlin Road Substation

ANNUAL TANK INSPECTION CHECKLIST

General Inspection Information

Tanks	**Inspected?**		
B1, B2, and LB1	Yes	No	
D1, D2, D3, D5, D6, D7, & D8	Yes	No	
DO1, DO5, WO7	Yes	No	

Inspection Guidance:

Further description and comments, if needed, should be provided on a separate sheet of paper and attached to this sheet. Non-conforming items important to tank or containment integrity require evaluation by an engineer experienced in AST design, a certified inspector, or a tank manufacturer who will determine the corrective action. Note the non-conformance and corresponding corrective action in the comment section.

Item	**Status**		**Comments**
Tank Containment			
Containment structure in satisfactory condition?	Yes NA	No	
Drainage pipes/valves fit for continued service?	Yes NA	No	
Tank Foundations and Supports			
Evidence of tank settlement or foundation washout?	Yes	No	
Cracking or spalling of concrete pad or ring wall?	Yes	No	
Tank supports in satisfactory condition?	Yes	No	
Water able to drain away from tank?	Yes	No	
Tank Shell, Heads and Roof			
Free of visible signs of coating failure?	Yes	No	
Free of noticeable distortions, buckling, denting, bulging, or holes?	Yes	No	
Free of standing water on roof?	Yes	No	
All labels/tags intacts and legible?	Yes	No	
Tank Manways, Piping, and Equipment			
Flanged bolts tight and fully engaed with no sign of wear or corrosion?	Yes	No	
Electrical Equipment			
Electrical boxes in good condition?	Yes NA	No	
Tank Equipment			
Normal and Emergency vents free of obstruction?	Yes	No	
Flame arrestors free of corrosion and are air passages free of blockage?	Yes NA	No	
Interstitial leak detection equipment in good conditon? Windows on sight guages clear? Wire connections intact? If equipment has a function, does it activate to confirm operation?	Yes NA	No	

Valves free of leaks, corrosion and other damage? Follow manufactures' instructions for regular maintenance of these items. Check the following and verify as applicable. o Anti-siphon valve o Check valve o Gate valve o Pressure regulator valve o Expansion relief valve o Solenoid valve o Fire valve o Shear valve	Yes	No	
Strainers and filters clean and in good condition?	Yes	No	
Level and Overfill Protection Instrumentation of Shop-Fabricated Tanks			
Tank liquid level sensing device tested to ensure proper operation?	Yes NA	No	
Tank liquid level sensing device operates as required?	Yes NA	No	
Overfill prevention devices in proper working condition?	Yes NA	No	
Additional Comments:			

Date: _____

Inspection By: _____

Signature: _____

ENVIRONMENTAL INCIDENT REPORTING

Verbal (Initial) Notification:
Be prepared to relay as much of the information listed below as is known or can be estimated at the time of reporting. This is an initial report and estimates can be corrected in your follow-up emergency notice report.

- Name and phone number of the person to contact for further information.
- Location and source of the release or discharge.
- Chemical name or identity of any substance involved in the release or discharge.
- Is the substance an extremely hazardous substance?
- Estimate of the quantity (gallons or pounds) discharged into the environment.
- Time and duration of the release or discharge.
- The environmental medium or media into which the substance was released or discharged.
- Potential health effects associated with the release or discharge of the substance.
- Report precautions taken, including evacuation, remediation, or other proposed response actions.

This information is required under ORC Section 3750.06(C) and Rule 3750-25-25(A)(1) of the Ohio Administrative Code (OAC).

Written Follow-Up Report:

After the spill, release or discharge, written follow-up emergency notice must be submitted within 30 days to the Ohio EPA Emergency Response Section and the local planning committee of the planning district in which the release or discharge occurred, unless the release was from a vessel, and then the report is sent only to the SERC. This follow-up emergency notice is your company's opportunity to explain in its own words the circumstances and actions relating to the release of pollutants to the environment. Your written emergency notice should follow the question sequence as indicated below. If any of the questions are not applicable to your incident, indicate N/A (not applicable) for that item.

Who

- Complete facility name, address and telephone number of the facility from which the release occurred.
- Complete name of owner and/or operator.

When

- Actual time, date, and duration of the discharge or release.
- Actual time and date of discovery of the release or discharge.
- Actions taken to respond to and contain the release or discharge.

- Indicate the spill number assigned by Ohio EPA. (If you do not know this number, call a duty officer during business-hours and ask. The telephone number is (614) 644-3194). If the National Response Center was notified, please provide their assigned case number.

Location

- Location of facility from which the release or discharge occurred.
- Location of release: county, township, and city.
- Longitude and latitude of the release, if known.
- Distance and direction from nearest intersection or milepost if it was a transportation-related release or discharge.

Product Release

- Common and/or technical name of the material released or discharged and CAS Numbers.
- What was the quantity and duration of the discharge? Indicate volume in gallons or pounds.

Environmental Impact

- Name of the environmental medium or media affected (i.e. navigable waters, land, and/or air). If navigable waters, please identify.
- What was the length of area of the navigable waterway affected?
- What was the ground surface area (square feet or yards) and depth of soil contamination?
- To the extent information is available; identify damage to wildlife and/or vegetation.
- To the extent information is available; identify impact to human health and safety (i.e. evacuations, exposure, etc.)
- Where appropriate, identify medical advice provided for exposed individuals and or local medical personnel.

Monitoring and Detection

- If the release or discharge was monitored, indicate the method of detection and concentrations detected.
- If the release was air-borne, how was the wind direction and speed determined?
- Was the public warned, and if so, how?

Mitigation, Containment Action

- How much product or waste was recovered or neutralized?
- How was the material recovered or neutralized?
- Were any other actions taken to reduce the impact of the discharge (containment, adsorbents, on-site treatment, etc.)?

Prevention Measures

- Please provide plans to prevent recurrence of the discharge or release which may occur at this specific source.
- This may include: employee training, replacement of equipment, construction, or security measures such as lighting, fencing or locks.

Health Risks

- List known or anticipated acute and chronic health risks of exposure associated with the substances which were released.

Permit Numbers

- Indicate any air, water, or other permit numbers which may be pertinent to this incident (voluntary information).
- If this is a NPDES/air permit, please enclose a copy of your current effluent/emission limitations.

Chronology

- Provide a chronological review of the incident. Include a chronology of communications with state and local government.

Documentation

- Provide any reports or other documents which pertain to the incident (e.g. accident reports, manifest, bills of lading, and laboratory analyses).

Causes

- Describe any extenuating circumstances which caused the discharge.

Economic Impact (This information is voluntary)

- Estimate the dollar value, if any, of the spilled product.
- What was the equipment damage cost (estimate)?
- What was the cost of spill cleanup (estimate)?
- What are the estimated costs of spill prevention to eliminate possible reoccurrence of this event?

This information (aside from the economic impacts) is required pursuant to ORC Section 3750.06(D) and OAC Rule 3750-25-25(A) (2).

The statute provides that if significant additional information regarding the mandatory or voluntary information submitted becomes known during the period between submission of the written report and one (1) year after the release or discharge, the owner or operator shall submit to the LEPC and the Ohio EPA an updated written notice within three (3) days after learning of the additional information.

This written follow-up report must be submitted within 30 days of the spill, release or discharge to:

Ohio EPA — DAPC/SERC
Lazarus Government Center
50 West Town Street, Suite 700
P.O. Box 1049
Columbus, Ohio 43216-1049

Note: the 30-day written spill/release notice to the Ohio EPA can be submitted by attaching the report and emailing to: SERCspillreport@epa.ohio.gov. Please reference the Ohio EPA, Emergency Response spill number on the email subject line.

OIL SPILL CONTINGENCY PLAN

Contents

1 Introduction

1.1 Purpose and Scope

1.2 Resources at Risk (40 CFR 109.5(b)(1))

1.3 Risk Assessment (40 CFR 109.5(c)(2))

1.4 Response Strategy

2 Spill Discovery and Response

2.1 Distribution of Responsibilities (40 CFR 109.5(a); 109.5(d)(2); and 109.5(b)(2))

2.2 Response Activities (40 CFR 109.5(d) and 109.5(e))

2.3 Discharge Notification

3 Response Resources and Preparedness Activities

3.1 Equipment, Supplies, Services and Manpower (40 CFR 109.5(c)(1)-(2); 109.5(d)(2)-(3))

3.2 Access to Receiving Waterbody

3.3 Communications and Control (40 CFR 109.5(b)(3) & 109.5(d)(3)

3.4 Training Exercises and Updating Procedures

1 Introduction

1.1 Purpose and Scope

This Oil Spill Contingency Plan (Contingency Plan) is prepared in accordance with 40 CFR 112.7(k)(2) to address the areas of the facility where secondary containment is not provided for qualified oil-filled operational equipment, as documented in Section 4.4 of the Spill Prevention, Control and Countermeasures (SPCC) Plan.

The purpose of this Contingency Plan is to define the procedures and tactics for responding to discharges of oil into navigable waters or adjoining shorelines of the United States, originating from oil-filled operational equipment at Oberlin Municipal Light & Power System (OMLPS) facilities in Oberlin, OH.

The objective of procedures described in this Contingency Plan is to protect the public, city personnel, and other responders during oil discharges. In addition, the Contingency Plan is intended to minimize damages to the environment, natural resources, and facility installations

from a discharge of oil. The Contingency Plan complements the prevention and control measures presented in the facility's SPCC Plan by addressing areas of the facility that have inadequate secondary containment and impacts that may results from a discharge from these areas. The facility implements an inspection program for the oil-filled operational equipment.

The Contingency Plan follows the content and organization of 40 CFR Part 109 and describes the responsibilities and basic procedures for responding to an oil discharge and performing cleanup operations.

1.2 Resources at Risk (40 CFR 109.5(b)(1))

The facilities are located within the Black River watershed. Refer to Section 4.3 of the SPCC Plan for details of the drainage patterns and nearby waterways for this facility.

1.3 Risk Assessment (40 CFR 109.5(c)(2))

The facility has transformers, voltage regulators, and circuit breakers that are not provided with secondary containment. A discharge of up to 2400 gallons could potentially reach Plum Creek via a storm sewer.

1.4 Response Strategy

City personnel are equipped and trained to respond to certain discharges confined within the facility. These discharges can generally be described as those where the quantity of oil discharged is small, the discharged material can be easily stopped or controlled, and the material is not likely to seep into groundwater or reach surface water or adjoining shorelines. Procedures for responding to these discharges are covered in Section 5.0 of the SPCC Plan.

2 Spill Discovery and Response

2.1 Distribution of Responsibilities (40 CFR 109.5(a); 109.5(d)(2); and 109.5(b)(2))

OMLPS has the primary responsibility for providing the initial response to oil discharge incidents originating from its facility. To accomplish this, OMLPS has designated the responsible technician as the qualified oil discharge response coordinator (Response Coordinator) in the event of a discharge.

The Response Coordinator has the authority to commit the necessary services and equipment to respond to the discharge and to request assistance from the local fire and/or police departments, contractors, or other responders, as appropriate.

The Response Coordinator will direct notifications and initial response actions in accordance with training and capabilities. In the event of a fire or emergency situation that threatens the health and safety of those present at the site, the Response Coordinator will direct evacuations and contact the fire and police departments.

In the event of an emergency involving outside response agencies, the Response Coordinator's

primary responsibility is to provide information regarding the characteristics of the materials and equipment involved and to provide access to city resources as requested. The Response Coordinator will notify the Facility Emergency Coordinator or Alternate immediately upon activation of the Contingency Plan. The Facility Emergency Coordinator is the designated representative for the SPCC Plan.

The Response Coordinator also serves as the coordinator for communications with emergency response personnel. The Response Coordinator has access to the SPCC Plan at the facility as printed material or electronic files that can further assist the response activities. All oil spill response personnel will be equipped with radio or mobile telephone communication devices. An oil discharge response operations center shall be established at the discretion of the Response Coordinator. If external personnel are used for oil spill response, they will be provided compatible radio communication devices or the mobile telephone numbers of other response personnel.

In the event that the responsible technician is not available, the responsibility and authority for initiating a response to a discharge rests with the most senior city personnel on site at the time the discharge is discovered.

2.2 Response Activities (40 CFR 109.5(d) and 109.5(e))

In the event of a discharge, the first priority is to stop the flow of oil and to shut off all ignition sources, followed by the containment, control and mitigation of the discharge. This Contingency Plan breaks actions to be performed to respond to an oil discharge into different phases, described in detail in the sections below.

For discharges described in Section 1.4, refer to the Emergency Response Procedures in Section 5.0 of the SPCC Plan.

Discharge Discovery and Source Control	
Completed	*Actions*
	Notify Facility Emergency Coordinator or Alternate (see Section 4.13 of the SPCC Plan)
	Notify proper authorities immediately upon discovery of reportable discharges (see Section 4.13 and Appendix A of the SPCC Plan)
	Immediately report to the Facility Emergency Coordinator (See Section 4.13 of SPCC Plan for contact information)
	Locate the source of the spill

Assessment and Notifications	
Completed	*Actions*
	Investigate the discharge to assess the actual or potential threat to human health or the environment: ⁾ Location of the discharge relative to receiving waterbodies; ⁾ Quantity of spilled material; ⁾ Ambient conditions (temperature, rain); ⁾ Other contributing factors such as fire or explosion hazards; and ⁾ Sensitive receptors downstream
	Request outside assistance from local emergency responders, as needed
	Evaluate the need to evacuate facility or nearby facilities, as needed
	Communicate with neighboring property owners regarding the discharge and actions taken to mitigate the damage

Control and Recovery (actions taken will depend on whether the oil has reached water or is still on land)	
Completed	*Actions*
If the oil <u>has not</u> yet reached water:	
	Contact cleanup contractor(s)
	Deploy sand bags and absorbent socks downgradient from the oil, or erect temporary barriers such as trenches or mounds to prevent the oil from flowing towards the drainage swale
	Implement land based response actions (countermeasures) such as digging temporary containment pits, ponds, or curbs to prevent the flow of oil toward waterbody.
	Deploy absorbent socks and sorbent materials along the drainage path to prevent oil from entering waters.
If the oil <u>has</u> reached water:	
	Contact cleanup contractor(s)
	Deploy floating booms immediately downstream from the release point.
	Control oil flow on the ground by implementing procedures outlined above.
	Deploy additional floating booms at the next access point downstream from the release point.

Disposal of Recovered Product and Contaminated Response Material	
Completed	*Actions*
	Collect and dispose of all recovered product and contaminated response materials in accordance with Section 6.0 of the SPCC Plan

Termination	
Completed	*Actions*
	Ensure that all repairs to the defective equipment have been completed.
	Review circumstances that led to the discharge and take all necessary precautions to prevent a recurrence.
	Evaluate the effectiveness of the response activities and make adjustments as necessary to response procedures and personnel training.
	Carry out personnel and contractor briefings as necessary to emphasize prevention measures or to communicate changes in operations or response procedures.
	Submit any required follow-up reports to the authorities (refer to Section 1.1 of the SPCC Plan)

2.3 Discharge Notification

Instructions and phone numbers for reporting a discharge are provided in Section 4.13 and Appendix A of the SPCC Plan.

3 Response Resources and Preparedness Activities

3.1 Equipment, Supplies, Services and Manpower (40 CFR 109.5(c)(1)-(2); 109.5(d)(2)-(3))

Spill cleanup materials are provided at the facility as described in Section 4.4 of the SPCC Plan and in the SPCC Site Diagrams.

This material is sufficient to respond to minor discharges at the facility and to initially contain a major discharge while waiting for additional material or support from outside contractors. The inventory is verified on a monthly basis during the facility inspection by designated personnel and is replenished as needed.

Additional material and equipment is available from the designated cleanup contractor(s) (refer to Section 4.13 of the SPCC Plan). The given cleanup contractor would deploy an Emergency Response Trailer that would equipped with the necessary equipment to handle the given spill quantities. The contractor has adequate supplies to handle the potential spill volume outlined in Section 4.3.

OMLPS has developed and will maintain an advance agreement with an oil spill response company to provide equipment, material, manpower and supplies to be used in responding to an

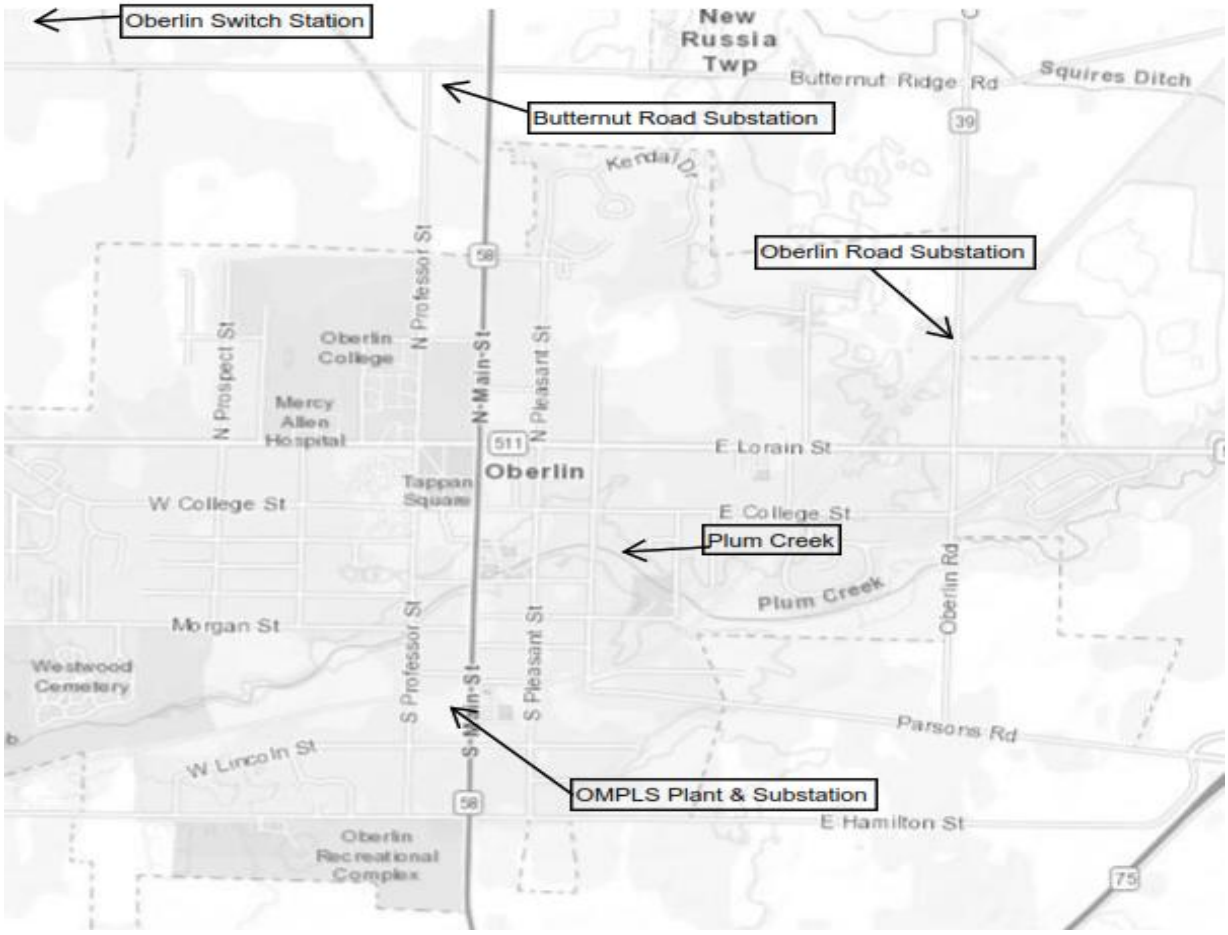
oil spill beyond the response capabilities of city personnel or designated representatives.

OMLPS maintains a list of employees and designated representatives trained and available to respond to an oil discharge. This list is maintained by the OMLPS Director. All employees are familiar with the facility layout, location of the spill response equipment, response strategies, and with the SPCC Plan and Contingency Plan for this facility. All have received training in the deployment of response material.

3.2 Access to Receiving Waterbody

Access points to the receiving waterbody are summarized as follows:

Access Point Description
All facilities have connections to storm drains that flow into Plum Creek



3.3 Communications and Control (40 CFR 109.5(b)(3) & 109.5(d)(3)

A central coordination center will be set up at the OMLPS administrative office located at 289

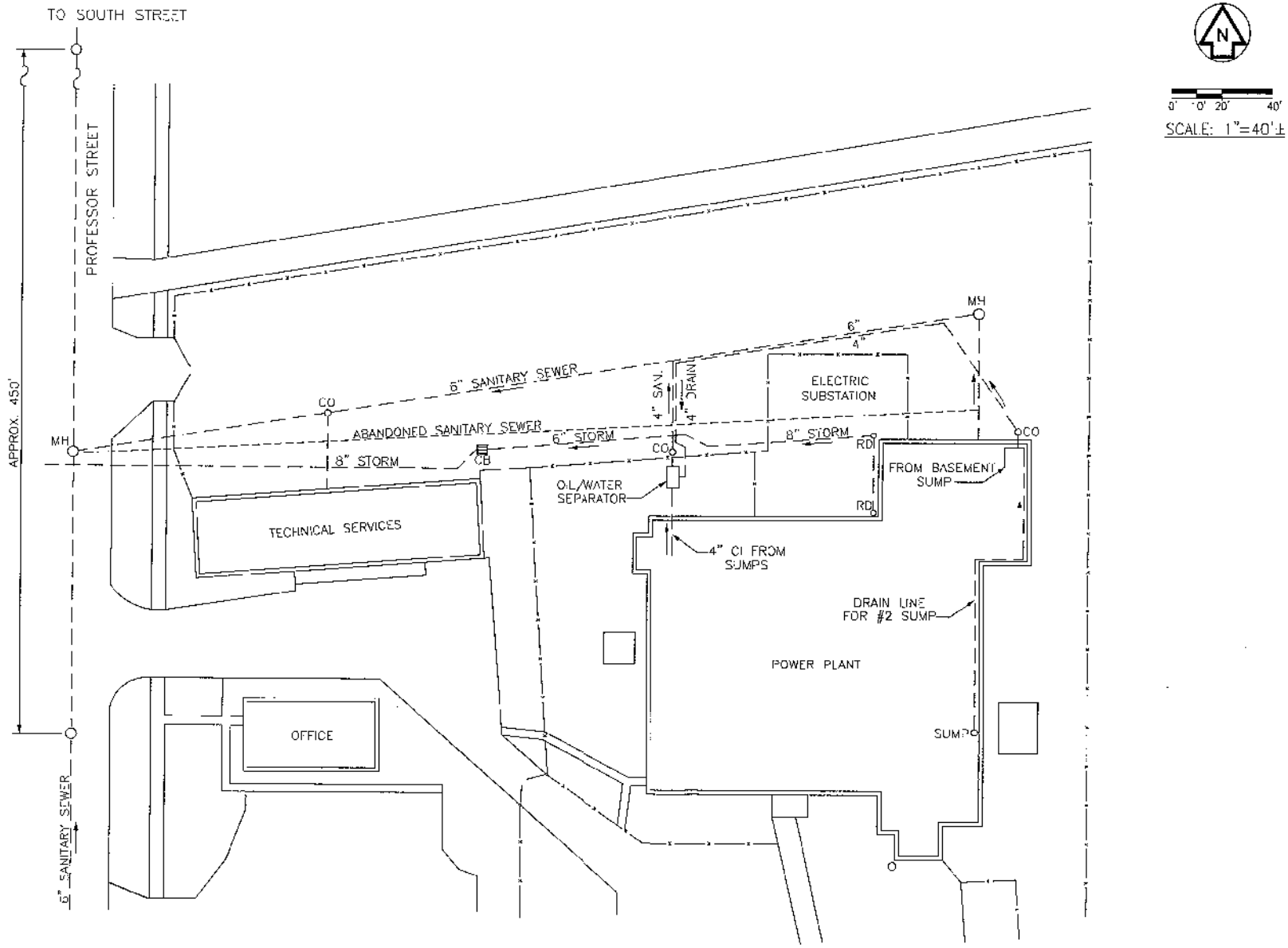
South Professor Street, Oberlin, OH 44074. The OMLPS office is equipped with land-line telephones, fax, cell phones, two-way radios, and computers. In addition, the responding technician's vehicle at the facility will be used as a mobile coordination center. Technicians and any other response personnel are equipped with radios and/or mobile telephone communication devices.

The Facility Emergency Coordinator (or Alternate Emergency Coordinator) is responsible for communicating the status of the response operations and for sharing relevant information with involved parties including local, state and federal authorities.

The Response Coordinator is responsible for directing all response and recovery activities at the facility.

3.4 Training Exercises and Updating Procedures

The training program outlined in Section 4.12 of the SPCC Plan serves as the training program for both the SPCC Plan and Contingency Plan. Following a response to an oil discharge, the Facility Emergency Coordinator and Response Coordinator will evaluate the actions taken and identify procedural areas where improvements are needed. The Facility Emergency Coordinator will conduct a briefing with field personnel, contractors and local emergency responders to discuss lessons learned and will integrate the outcome of the discussion in subsequent SPCC briefings and training sessions. As necessary, the Facility Emergency Coordinator will amend this Contingency Plan or SPCC Plan to reflect changes made to the facility equipment and procedures. Any changes will be made in accordance with Section 5.3 of the SPCC Plan.



This Drawing has been recreated from a hard copy to an Electronic Cad File and All Locations Should Be Field Verified.

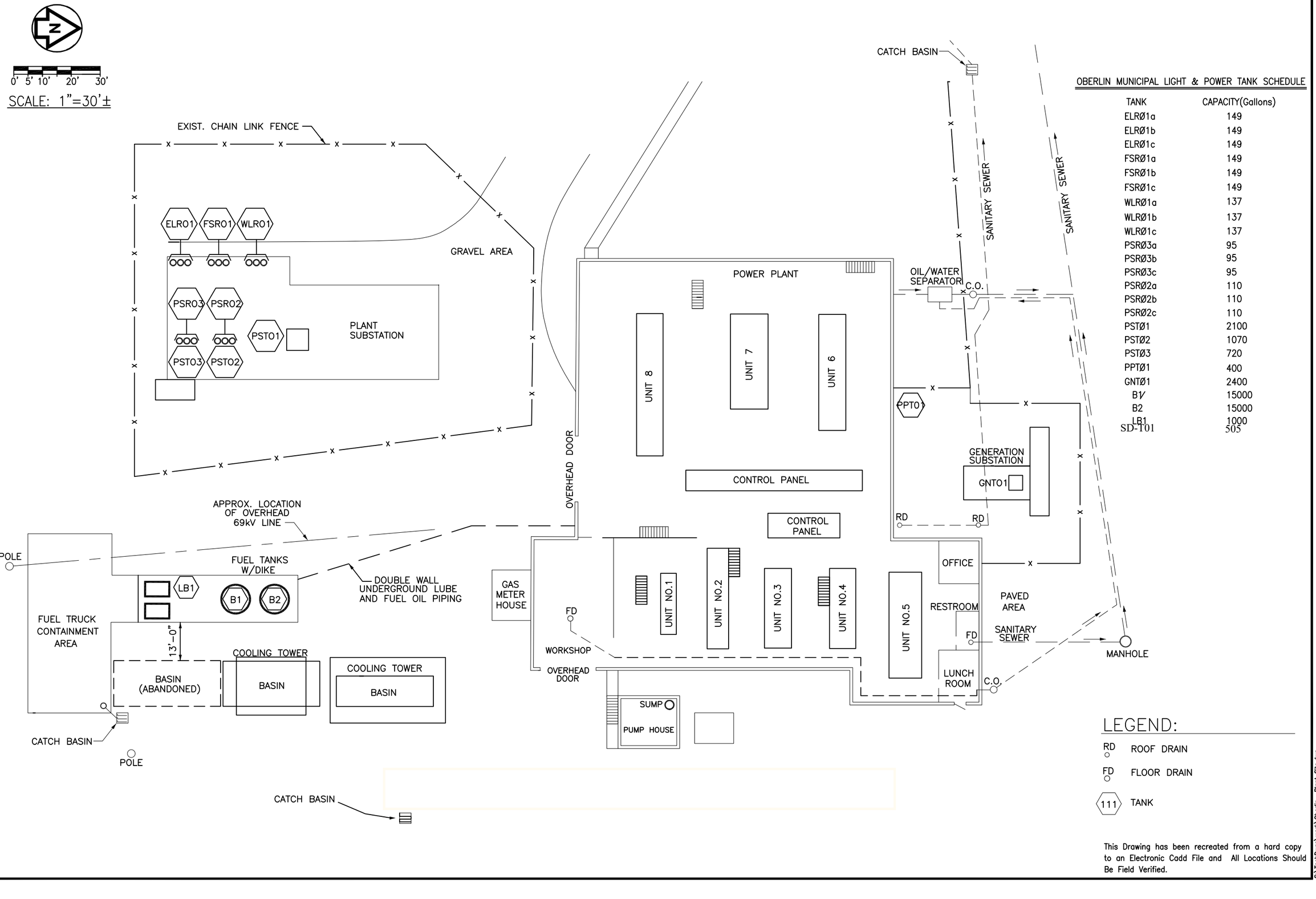
American Municipal Utilities

AMP OHIO

REV.	DATE	BY	DESCRIPTION
1			
2			
3			

OBERLIN, OHIO
Municipal Light and Power System
LOCATION PLAN

DES. BY: RM
DRN. BY: gu
CHK. BY: RM
JOB No. 000
DATE: 9-19-06
DWG. No. 1 of 5



OBERLIN MUNICIPAL LIGHT & POWER TANK SCHEDULE

TANK	CAPACITY(Gallons)
ELRØ1a	149
ELRØ1b	149
ELRØ1c	149
FSRØ1a	149
FSRØ1b	149
FSRØ1c	149
WLRØ1a	137
WLRØ1b	137
WLRØ1c	137
PSRØ3a	95
PSRØ3b	95
PSRØ3c	95
PSRØ2a	110
PSRØ2b	110
PSRØ2c	110
PSTØ1	2100
PSTØ2	1070
PSTØ3	720
PPTØ1	400
GNTØ1	2400
B1	15000
B2	15000
LB1	1000

SD-T01 505

LEGEND:

RD ROOF DRAIN

FD FLOOR DRAIN

111 TANK

This Drawing has been recreated from a hard copy to an Electronic Cadd File and All Locations Should Be Field Verified.

American Municipal Utilities

AMP OHIO

REV.	DATE	BY	DESCRIPTION
1	6/20	RH	
2			
3			

OBERLIN, OHIO
Municipal Light and Power System

POWER PLANT SITE PLAN

DES. BY: RM

DRN. BY. gu

CHK. BY. RM

JOB No. 000

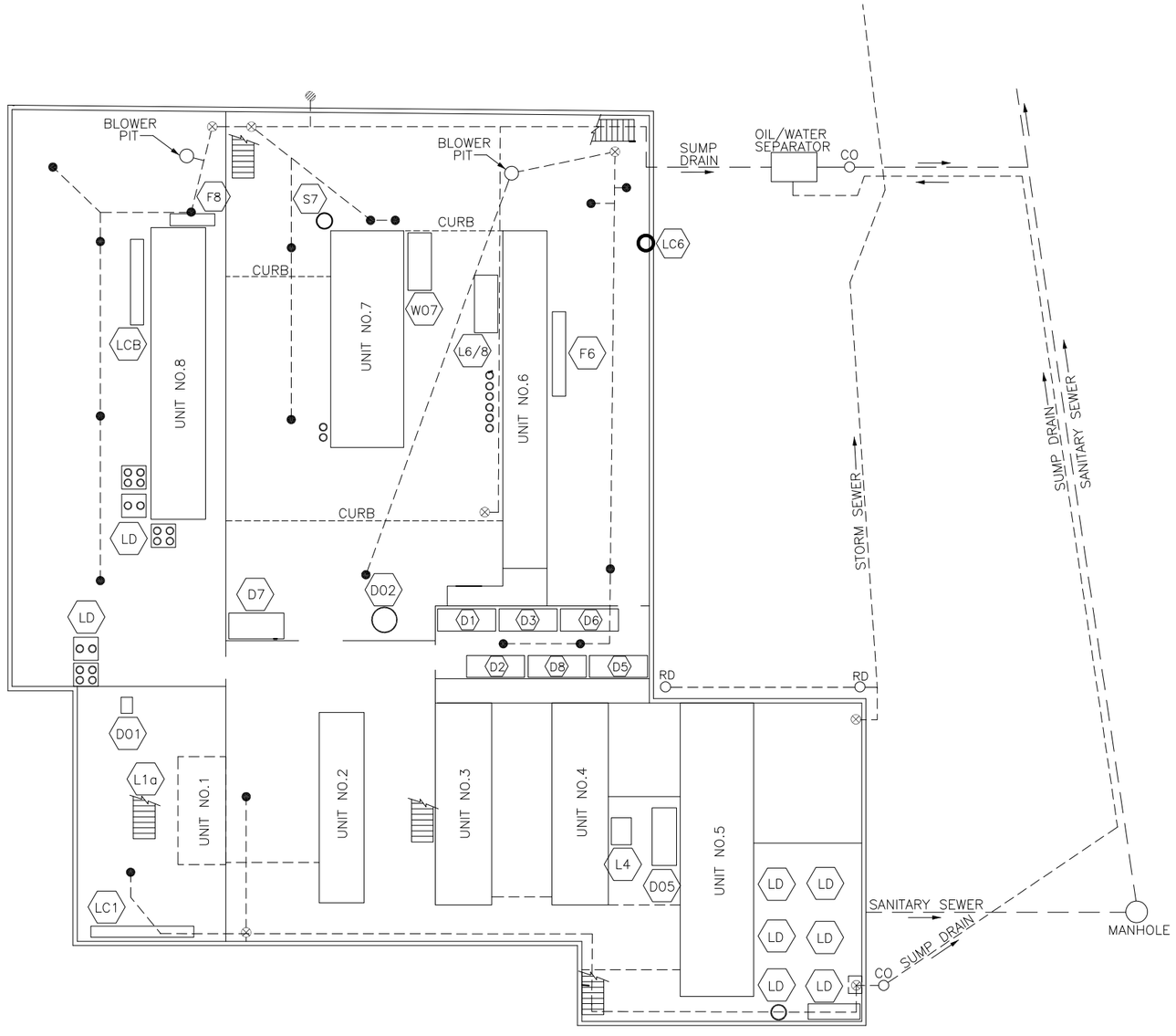
DATE: 11-16-06

DWG.No. 2 of 5

S:\TechDwgs\work\Oberlin Plant Site.dwg

0' 10' 20' 40'

SCALE: 1"=40'±



NORTH

OBERLIN MUNICIPAL LIGHT & POWER TANK SCHEDULE

TANK	CAPACITY(Gallons)
F8	70
LC8	100
LD	55 Gallons/Drum
DO1	585
L1a	100
LC1	175
S7	150
WO7	2000
L 6/8	1100
DO2	650
D1	635
D2	635
D3	650
D5	635
D6	1000
D7	300
D8	650
F6	60
LC6	90
L4	275
DO5	330

LEGEND:

- RD — ROOF DRAIN
- FD — FLOOR DRAIN
- CO — CLEAN OUT
- FLOOR DRAIN (TO BE PLUGGED)
- SUMP
- FLOOR DRAIN (PLUGGED)
- 111 — TANK

This Drawing has been recreated from a hard copy to an Electronic Cadd File and All Locations Should Be Field Verified.

American Municipal Utilities

Your Community Utility Partner

AMP OHIO

REV.	DATE	BY	DESCRIPTION
1	6/30	RH	
2			
3			

OBERLIN, OHIO
Municipal Light and Power System
POWER PLANT

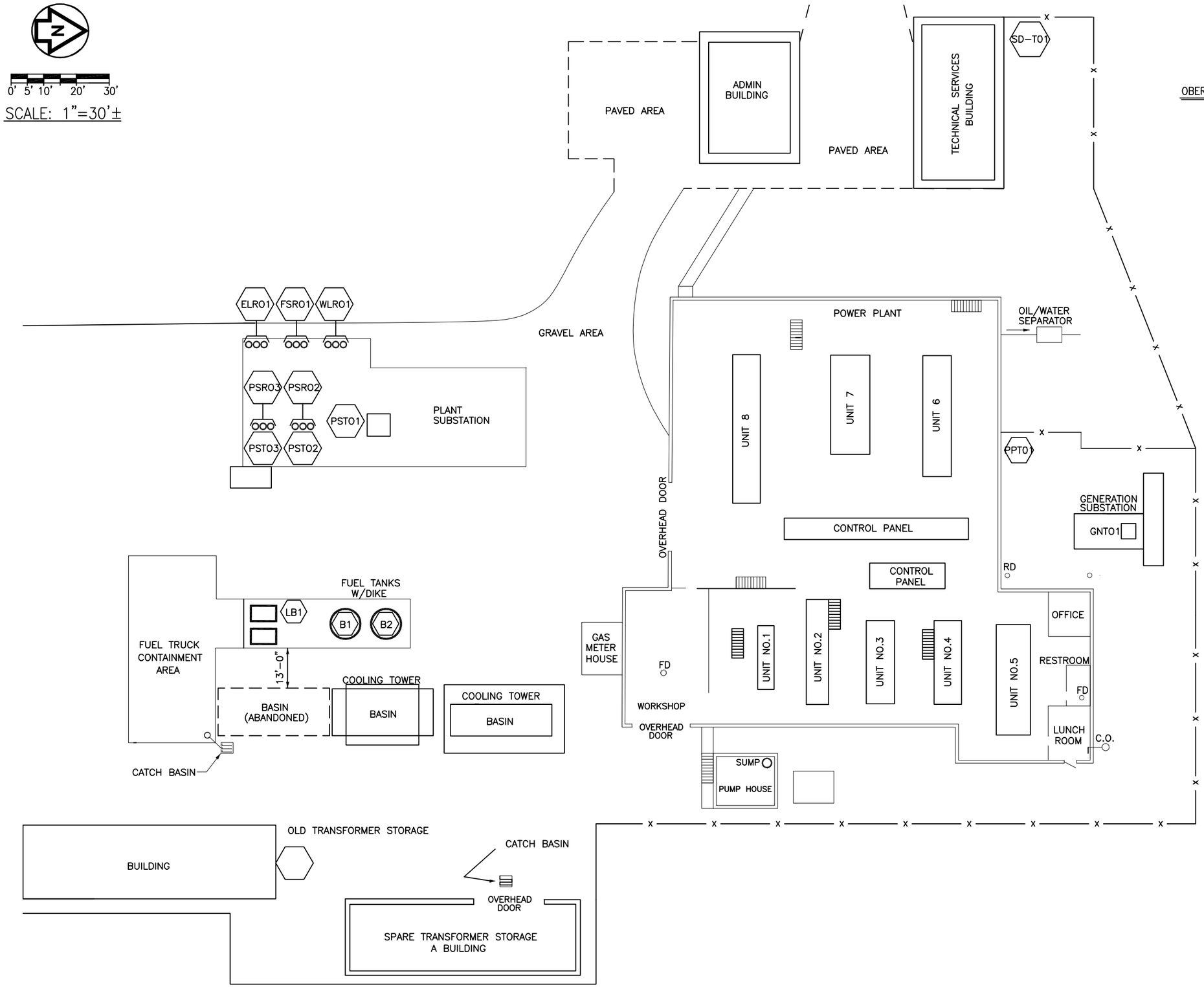
DES. BY: RM
DRN. BY. gu
CHK. BY. RM

JOB No. 000

DATE: 1-17-07

DWG.No. 3 of 5

S:\TechDrgs\work\Oberlin Basement.dwg



OBERLIN MUNICIPAL LIGHT & POWER TANK SCHEDULE

TANK	CAPACITY(Gallons)
ELRØ1a	149
ELRØ1b	149
ELRØ1c	149
FSRØ1a	149
FSRØ1b	149
FSRØ1c	149
WLRØ1a	137
WLRØ1b	137
WLRØ1c	137
PSRØ3a	95
PSRØ3b	95
PSRØ3c	95
PSRØ2a	110
PSRØ2b	110
PSRØ2c	110
PSTØ1	2100
PSTØ2	1070
PSTØ3	720
PPTØ1	400
GNTØ1	2400
SD-TØ1	505
B1	15000
B2	15000
LB1	1000

LEGEND:

- RD ROOF DRAIN
- FD FLOOR DRAIN
- 111 TANK

This Drawing has been recreated from a hard copy to an Electronic Cadd File and All Locations Should Be Field Verified.

American Municipal Utilities

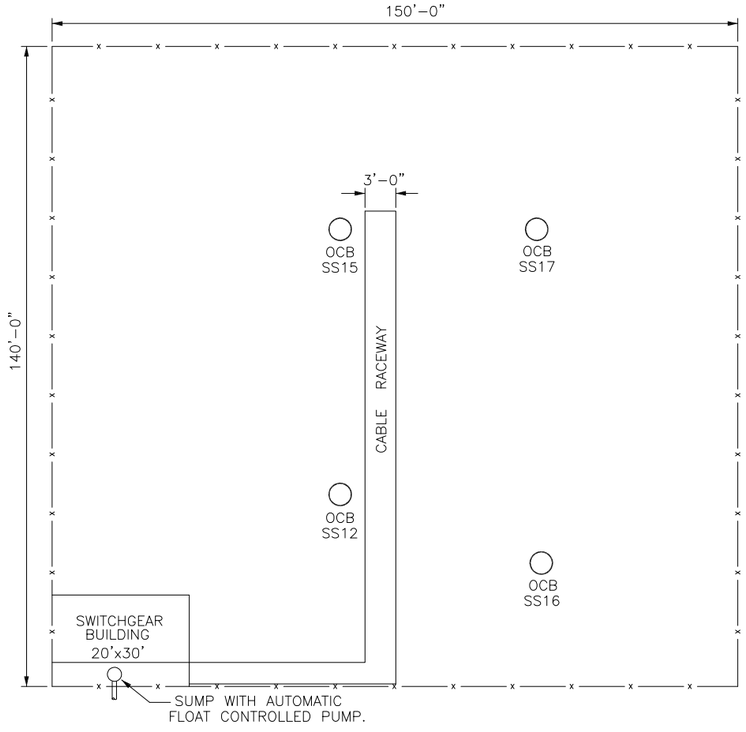
AMP OHIO

REV.	DATE	BY	DESCRIPTION
1			
2			
3			

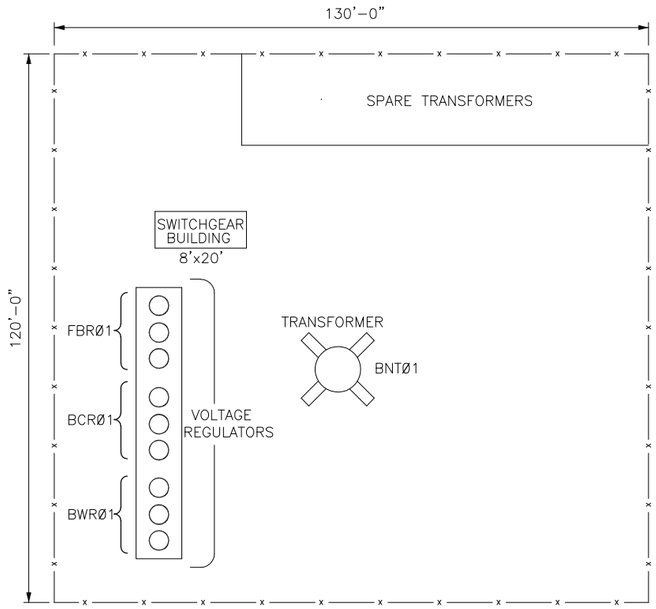
OBERLIN, OHIO
Municipal Light and Power System
POWER PLANT BUILDING OVERVIEW

S:\Tech2wga\work\Oberlin Plant Building Overview.dwg

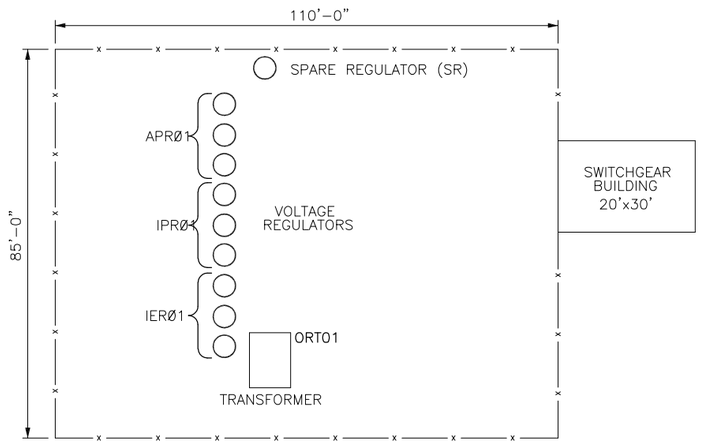
DES. BY:	RH
DRN. BY.	gu
CHK. BY.	RM
JOB No.	000
DATE:	6-30-2020
DWG.No.	



SWITCH STATION



BUTTERNUT SUBSTATION



OBERLIN ROAD SUBSTATION

OBERLIN MUNICIPAL LIGHT & POWER TANK SCHEDULE

TANK	CAPACITY(Gallons)
FBR01a	137
FBR01b	137
FBR01c	137
BCR01a	172
BCR01b	172
BCR01c	172
BWR01a	137
BWR01b	137
BWR01c	137
SS12	350
SS15	350
SS16	350
SS17	350
BNTØ1	2600
ORTØ1	1980
SR	110
IERØ1a	110
IERØ1b	110
IERØ1c	110
IPR01a	149
IPRØ1b	149
IPRØ1c	149
APRØ1a	137
APRØ1b	137
APRØ1c	137

This Drawing has been recreated from a hard copy to an Electronic Cadd File and All Locations Should Be Field Verified.

NORTH

0' 5' 10' 20' 30'

SCALE: 1"=30'±

American Municipal Utilities

Your Community Utility Partner

AMP OHIO

REV.	DATE	BY	DESCRIPTION
1	6/20	RH	
2			
3			

OBERLIN, OHIO
Municipal Light and Power System

Substations With 1,320 Gallons or Greater Oil Storage Capacity

DES. BY: RM

DRN. BY. gu

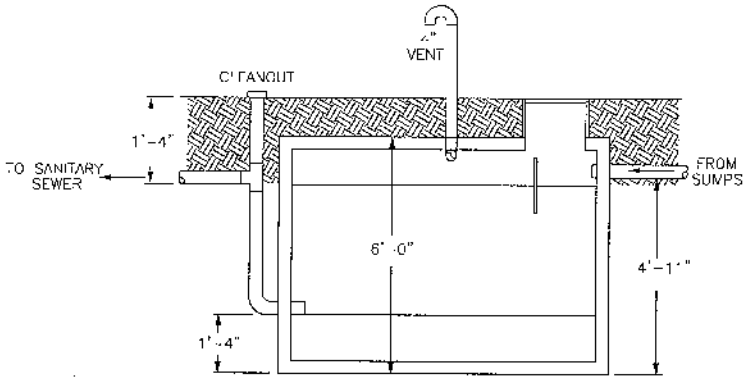
CHK. BY. RM

JOB No. 000

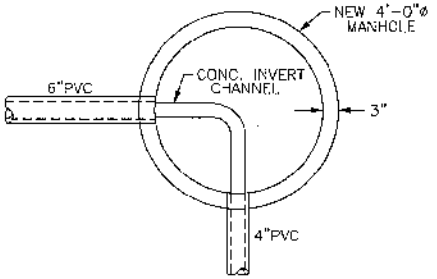
DATE: 1-17-07

DWG.No. 4 of 5

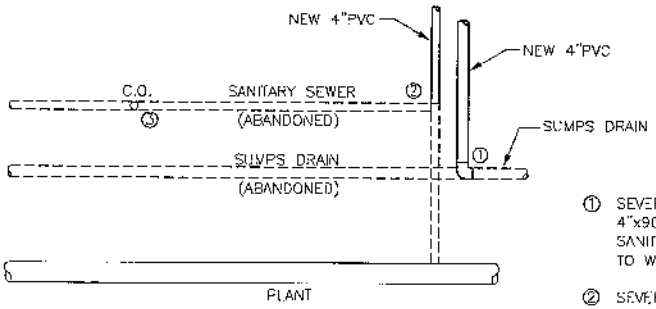
S:\TechDwgs\work\Oberlin Sub-Details.dwg



NEW OIL/WATER SEPARATOR
N.T.S.



BOTTOM OF MANHOLE #1
SANITARY LINE
N.T.S.

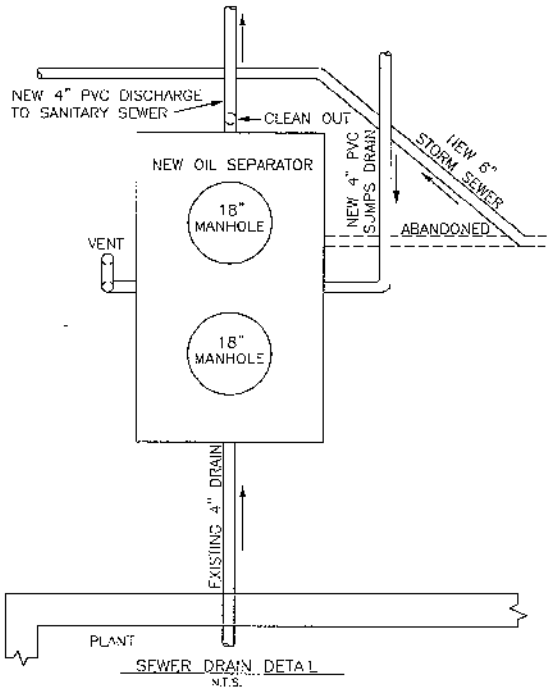


SEWER DRAIN DETAIL
N.T.S.

① SEVER SUMPS DRAIN AS SHOWN. INSTALL 4"x90° BEND. RUN TO NEW MANHOLE ABOVE SANITARY LINE. SEAL SEVERED END OF LINE TO WEST.

② SEVER SANITARY LINE AS SHOWN. CONNECT SANITARY LINE TO NEW MANHOLE. SEAL SEVERED END OF LINE TO WEST.

③ REMOVE CLEAN-OUT 1'-0" BELOW GRADE SANITARY LINE TO NEW MANHOLE. SEAL



SEWER DRAIN DETAIL
N.T.S.

This Drawing has been recreated from a hard copy to an Electronic Cadd File and All Locations Should Be Field Verified.

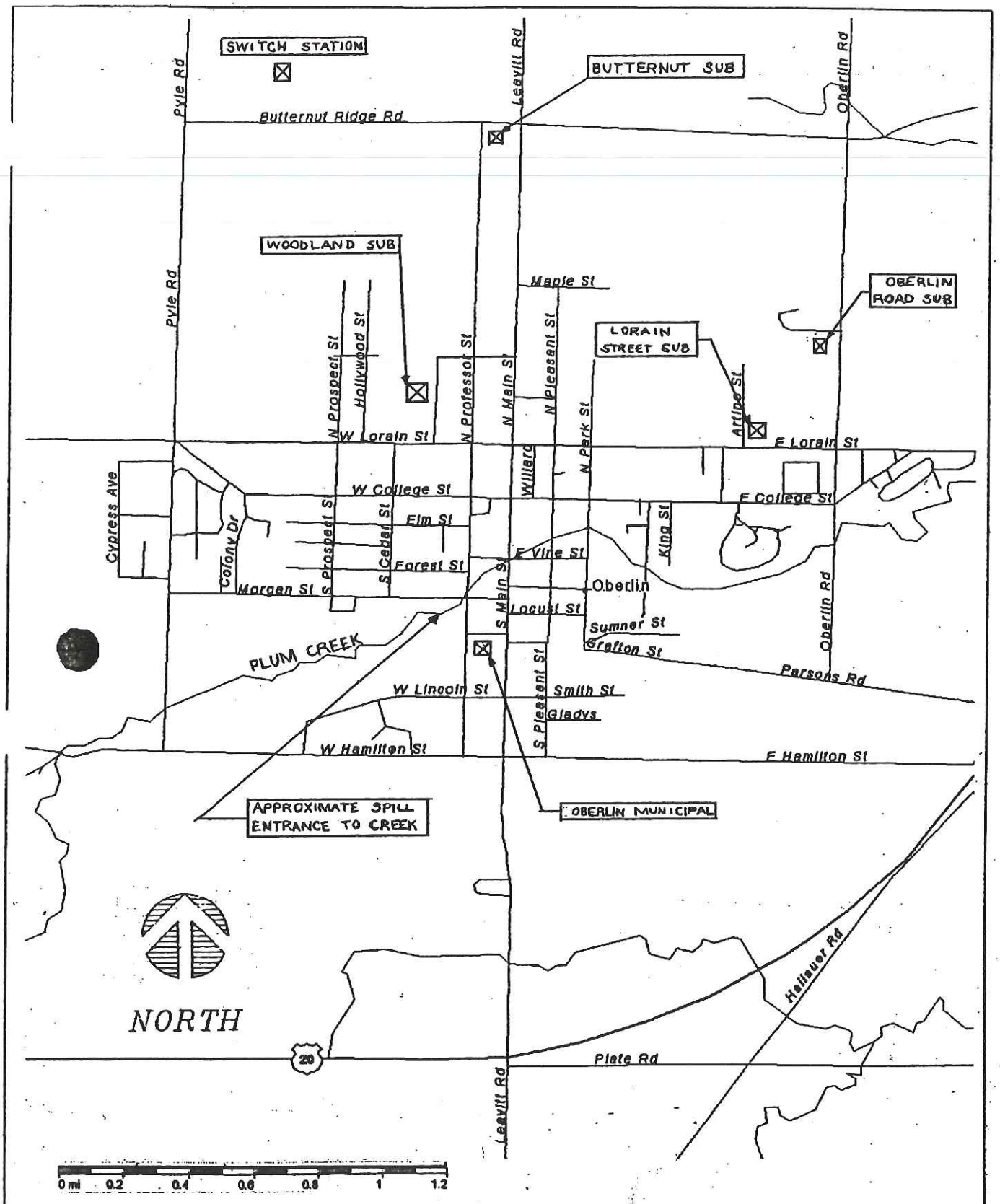
American Municipal Utilities

AMP OHIO

REV.	DATE	BY	DESCRIPTION
1			
2			

OBERLIN, OHIO
Municipal Light and Power System
VARIOUS DETAILS

DES. BY: RM
DRN. BY: gd
CHK. BY: RM
JOB No. 000
DATE: 9-19-06
DWG.No. 5 of 5



CITY MAP

MUNICIPAL ELECTRIC UTILITY

OBERLIN, OHIO

DRWN. PGM	ASSOCIATED CONSULTANTS ENGINEERS	PROJ. 00691
CHKD	REGISTERED PROFESSIONAL ENGINEERS	NO. 1
APPD	PHONE: (763) 559-5511	OF 5
SCALE GRAPHIC	FAX: (763) 559-5514	DATE 10/16/00

Stormwater Pollution Prevention Plan

for:

Oberlin Service Complex
583 Hillcreek Drive
Oberlin, OH 44074

SWPPP Contact(s):

Stormwater Coordinator
Jennifer Reeves
85 South Main Street
Oberlin, OH 44074
440-776-4871

SWPPP Preparation Date:

12/15/16

Revised:

6/5/19

7/27/21

11/9/21

3/21/22

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Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)

SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Oberlin Service Complex

Street: 583 Hillcreek Dr

City: Oberlin State: OH ZIP Code: 44074

County: Lorain

MS4 Permit Number: 3GQ10012*DG Facility Permit Number: N/A

MS4 Permittee Name: Lorain County Storm Water Management District

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude:	Longitude:
1. 41 º 17 ' 50.33" N (degrees, minutes, seconds)	1. 82 º 11 ' 49.43" W (degrees, minutes, seconds)
2. _ _ º _ _ . _ _' N (degrees, minutes, decimal)	2. _ _ º _ _ . _ _' W (degrees, minutes, decimal)
3. _ _ . _ _ _ _ º N (decimal)	3. _ _ . _ _ _ _ º W (decimal)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS

☒ Other (please specify): Google Earth

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 6.90 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☒ Yes ☐ No

If yes, name of MS4 operator: City of Oberlin

Name(s) of water(s) that receive stormwater from your facility: Wetlands with Plum Creek Watershed

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No

If Yes, identify name of the impaired water (and segment, if applicable):_____

Identify the pollutant(s) causing the impairment:_____

For pollutants identified, which do you have reason to believe will be present in your discharge? _____

For pollutants identified, which have a completed TMDL? _____

Use the table below or refer to Attachment D in Permit OHR000006 to answer the following;

Description of Municipal Activities at this Facility: Maintenance Garages / Service Yard

Subsector(s) (choose all that apply): P1

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Compost Yard, Leaf Collection Yard	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

*If the transfer station is located at the landfill where the waste will be disposed, use Subsector L1.

1.2 Contact Information/Responsible Parties

MS4 Facility Operator (s):

Name: City of Oberlin
Address: 85 South Main Street
City, State, Zip Code: Oberlin, OH 44074
Telephone Number: 440-775-1531
Email address: jbaumann@cityofoberlin.com
Fax number: 440-775-7208

MS4 Facility Owner (s):

Name: City of Oberlin
Address: 85 South Main Street
City, State, Zip Code: Oberlin, OH 44074
Telephone Number: 440-775-1531
Email address: jbaumann@cityofoberlin.com
Fax number: 440-775-7208

MS4 SWPPP Contact:

Name: Jennifer Reeves, Stormwater Coordinator
Telephone number: 440-776-4871
Email address: jreeves@cityofoberlin.com
Fax number: 440-774-9714

1.3 Stormwater Pollution Prevention Team

Staff Names	Individual Responsibilities
Jennifer Reeves	Stormwater Coordinator
Dawn Ferro	General Maintenance, Division Superintendent

1.4 Activities at the Facility

The City of Oberlin Service Complex serves as a storage and maintenance facility for municipal activities that are performed around the City. The site is made up of a main building which has a garage and offices within it, a cold storage building, a refuse and wash building, a salt storage building, and outdoor areas for material and gravel stockpiles. There is also a fueling station on site that is covered and is equipped with underground tanks.

Most buildings on site have multiple industrial activities that take place. Below is a table that shows what occurs in each building.

Building	Industrial Activities
Main Building	Pain Barrel Storage, Sign Repair, Equipment and Vehicle Storage and Maintenance, Used Oil Storage, and Material Storage
Cold Storage Building	Material Storage
Refuse and Wash Building	Equipment and Vehicle Storage, Maintenance, and Wash
Salt and Material Storage Building	Salt, Gravel, Sand, etc. Stockpiling

1.5 General Location Map

A copy of the general location map for this facility is located in Attachment A.

1.6 Site Map

A copy of the site map for this facility is located in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Paint Barrel Storage	Paint
Sign Repair	Paint, solvents, and material particles
Equipment and Vehicle Storage	Fuel, antifreeze, oils
Equipment and Vehicle Maintenance	Fuel, antifreeze, oils
Equipment and Vehicle Wash	Fuel, antifreeze, oils, sediment, detergents
Equipment and Vehicle Fueling	Fuel
Top Soil Stockpiling	Sediment
Stone, Gravel, Sand, etc. Stockpiling	Sediment
Salt Stockpiling	Salt
Industrial Activity	**Associated Pollutants**
Materials Storage	Sediment and material particles
Construction and Demolition Debris Storage	Sediment and material particles
Used Oil Storage	Oils

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Paint Barrel Storage Area	Wetlands within Plum Creek Watershed
Salt Storage Shed	Wetlands within Plum Creek Watershed
Stockpile Areas	Wetlands within Plum Creek Watershed
Maintenance Areas	Wetlands within Plum Creek Watershed
Fueling Area	Wetlands within Plum Creek Watershed
Vehicle Washing Area	Wetlands within Plum Creek Watershed
Used Oil Storage Container	Wetlands within Plum Creek Watershed
Vehicle and Equipment Storage Areas	Wetlands within Plum Creek Watershed

Description of Past Spills/Leaks

Date	Description	Outfalls
	None	

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation: June 18, 2015
- Description of the evaluation criteria used: Site Inspection
- List of the outfalls or onsite drainage points that were directly observed during the evaluation: OF02 & OF03 (See Attachment B)
- Different types of non-stormwater discharge(s) and source locations: There are currently no known non-stormwater discharges at this site

  The following are acceptable non-storm water discharges (illicit discharges) only if they are not "significant contributors of pollutants to the MS4":

  - Water line flushing
  - Landscaping irrigation
  - Irrigation water
  - Diverted stream flows
  - Springs
  - Rising ground waters
  - Uncontaminated ground water infiltration
  - Uncontaminated pumped ground water
  - Flows from riparian habitats and wetlands
  - Discharges from potable water sources
  - Water from crawl space pumps
  - Foundation drains

- Air conditioning condensation
- Footing drains
- Lawn watering
- Individual residential car washing
- Dechlorinated swimming pool discharges
- Street wash water
- Discharges or flows from firefighting activities

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. *For example, a catch basin was re-routed to sanitary for provide an area to dewater catch basin cleanings, the discharge of leachate from composting is being collected and sprayed back onto the piles, or an NPDES permit application was submitted for an unauthorized illicit discharge:* No unauthorized non-stormwater discharges were documented from the site.

2.4 Salt Storage

There is a covered salt storage shed with walls on three sides. A berm has been constructed along the open end of the shed to control any possible polluted runoff from discharging into the surface waters.

Figure 1 – Salt Storage Building

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the extent practical. Following is a list of special structural controls or practices that are implemented to minimized the exposure to rain, snow, snowmelt and runoff specific to the Service Complex:

- The salt stockpile is stored in a covered salt storage shed with a 2' high berm, on the open end, to contain any storm water runoff from the area.
- The outdoor stone, gravel, sand, etc. stockpiles and storage areas are located so that the storm water runoff from them will drain to one of the two stormwater detention basins that are located on the site before discharging off site to area's currently delineated as wetlands.
- The paint barrels are stored inside the building on a concrete slab to protect in case of a spill.
- The sign storage / repair area is inside the main building on a concrete slab to protect in case of a spill and prevent stormwater from coming into contact with any particulates.
- The fueling station is located on concrete pavement and is covered to protect in case of a spill. There is also a spill kit at the fueling station.
- Vehicle and equipment maintenance is done inside the main building and refuse and wash building in bays that have a drain to contain any spills and routed thru the oil/water separator, which then goes to the sanitary sewer.
- Vehicles and equipment are stored under cover and on concrete pavement to control the potential of pollution, from spills and leaks. The areas are also graded so that any runoff will drain to catch basins that are routed thru the oil/water separator, which then goes to the sanitary sewer.
- The used oil storage container is located on a concrete slab to protect against the possibility of pollution from a spill or leak.
- Old vehicle and equipment storage area is graded so that the runoff drains to one of the two stormwater detention basins that are located on the site before discharging off site and to area's currently delineated as wetlands and the fluids have been drained.
- The vehicle wash is located in a covered bay with a drain that collects the discharge and treats it.
- Uncovered outside storage areas are graded so that the runoff drains to one of two stormwater detention basins before discharging off site to area's currently delineated as wetlands.
- Grass filters and vegetated swales are used around and throughout the entire site to control sediment and pollutants, discharging from the site.
- There is a storm water overflow basin located on the site to control the storm water quantity discharge from the site.

Figure 2 – Covered Fueling Station

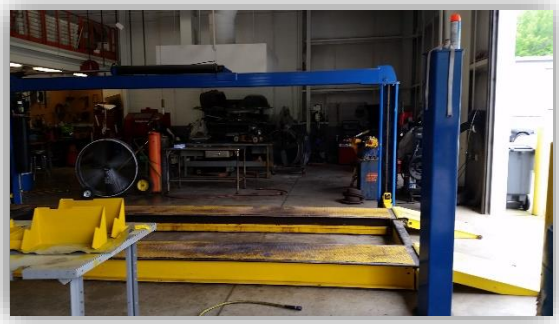


Figure 3 – Covered Maintenance Bay w/ Concrete Floor

Figure 4 – Used Oil Containers

Figure 5 – Wash Garage w/ Floor Drain

Figure 6 – Outdoor Material Storage

3.2 Good Housekeeping

The intent of Good Housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which helps to reduce the potential of pollution of storm water. The following prevention measures shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights so as to be easily accessed.

- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation.
- Make sure items are stored away from areas where the chance of an accident to occur is greater.
- Refill materials in secondary containments or indoors.
- Look to install leak detection devices, overflow controls and diversion berms.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or nontoxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up drips and spills promptly.
- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.

Waste material shall be picked up on a regular schedule, set by the City or additional picks ups when needed. Storage containers shall be inspected, yearly at a minimum, along with equipment and vehicles being used regularly. Stored vehicles and equipment shall be continuously inspected for leaks.

Figure 7 – Materials Stored, Labeled, and Stacked

3.3 Maintenance

It is important to properly inspect and maintain equipment, vehicles and systems, including vegetated swales, green areas, storm water detention basins, storm sewer, sanitary system, and oil/water separator associated with the City of Oberlin to detect potential issues that may cause pollutants to storm water. Vegetated swales shall be cleaned of debris yearly or after major storm events. Green areas and shall be mowed and cleaned of debris. Detention basins shall be maintained per their original plan. The storm sewer system shall cleaned yearly or after major storm events. The oil/water separator shall be inspected yearly and cleaned, to ensure that it works properly.

3.4 Spill Prevention and Response

When a spill does occur, quick and effective response will prevent pollutants from reaching storm water. Spills will be cleaned up promptly and not allowed to evaporate so that pollutants do not remain on the pavement to be washed to the storm drains with the next rain or remain in the soil to become a possible groundwater pollutant. If the spill is on an unpaved surface, determine whether the contaminated soil should be removed to prevent it from being a source of future storm water pollutants. Spill procedures will also include cleaning up leaks, drips, and other spills without water whenever possible. It is important to make sure that all the material is picked up and that the cleanup waste is properly disposed of and stored until removed.

Spill prevention and response procedures for hazardous materials stored or handled onsite will follow the procedures described in the facility Hazardous Materials Management Plan. Responsible personnel will contain and collect the spilled substance, then dispose of the substances and any contaminated soil in compliance with local hazardous materials regulations.

With any spill it is important to determine the scope of spill and follow the appropriate procedure outlined below. Non-hazardous spills can be categorized as small spills, medium spills and large spills.

- Small spills**:** These are spills that can be wiped up with a shop rag. Wet rags will not be put in the dumpster with the shop trash. They will be stored in a covered bin like the kind used at auto service stations. Used rags will be sent to a professional cleaning service or disposed of with the hazardous wastes if necessary.

- Medium-sized spills**:** These are spills too large to wipe up with a rag. Medium sized spills will be contained and soaked up using dry absorbent material such as: Vermiculite, specially-prepared sawdust, or kitty litter. Absorbent snakes may be used as temporary brooms to contain and soak up the liquid. Used absorbent material will be swept up or collected and will be disposed of with the shop trash if non-hazardous or with the hazardous wastes if necessary. A wet/dry shop vacuum cleaner may also be used to collect spills and dispose of the liquid with hazardous wastes. Vacuums will not be used for gasoline, solvents, or other volatile fluids, because the enclosed vacuum may become an explosive hazard.

- Large spills**:** Spills of non-hazardous liquids will be contained and cleaned using a minimum amount of wash water. Storm drain inlets or sewer inlets will be plugged to prevent the spill from entering the MS4. Temporary plugs will be kept onsite for the facility inlets and employees will be trained in when and how to use them.

- Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, 40 CFR Part 302, occurs during a 24-hour period, you shall notify the Ohio EPA Division of Emergency and Remedial Response at (800)282-9378 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. Contact information shall be in locations that are readily accessible and available.

A Spill/Release Incident Reporting form should be filled out promptly after a spill or release, and kept for OEPA auditing.

It is important that every employee is aware of the spill prevention, control and cleanup procedures. Training sessions for the employees along with mock spill response sessions should be conducted on an annual basis to prepare employees for real spills. There shall be spill response kits in all buildings and outdoors near fueling or loading stations. The spill response kit should contain:

- Absorbents
- Broom/dust pan
- Shovel
- Berms/socks
- Paper or cloth towels
- Safety goggles and gloves
- Phone numbers for appropriate cleanup authorities

The spill kits must be replenished soon after usage and checked at regular intervals. There will also be "Spill Response Procedures" posters posted around the facility.

Figure 8 – Spill Kit at Fueling Station

3.5 Erosion and Sediment Controls

The erosion and sediment controls are implemented stabilization measures, vegetated swales, stormwater detention basins, bioretention cell, and berms. The site is fairly flat, so there are no steep slopes. All roads/drives, material storage and staging areas and parking lots are either concrete, gravel or recycled grindings to control erosion and potential offsite discharges of sediment. All disturbed areas are seeded and mulched per MS4 criteria.

Figure 9 – Detention Basin & Outlet Structure

Figure 10 – Bioretention Cell

Figure 11 – Grass Filters & Vegetated Swales Used Throughout Site

Figure 12 – Gravel Drainage Ditch

3.6 Management of Runoff

The site is designed to help manage runoff by routing runoff to one of two storm water detention basins through vegetated swales, bioretention cells, or catch basins and storm sewers. The detention basins limit the amount of runoff and outlet to areas currently delineated as wetlands. A large portion of the impervious area is graded to drain to a bioretention cell which is used to reduce the amount of runoff from the site. Some infiltration may also occur in the detention basins.

Natural vegetation has been left where ever possible. A stormwater overflow basin has also been constructed, on the site, to manage runoff from the site.

3.7 Salt Storage Piles or Piles Containing Salt

The salt pile is in a covered salt storage shed to prevent the discharge of storm water from the stockpile. A 2' high berm has also been placed along the open side of the shed to control any runoff from the stockpile.

3.8 MSGP Sector-Specific Non-Numeric Effluent Limits

N/A – This site (sector P) has no non-numeric effluent limits

3.9 Employee Training

Successful storm water pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the City of Oberlin Service Complex. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm drains, because the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain so that they understand the importance of preventing storm water pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel.
- New personnel will be required to review and understand this document prior to initiating work activities.
- Retraining will be completed, if violations continue to occur.
- Information material shall be displayed to remind workers of BMPs practices.
- Contractors working at the facility shall be required to complete Pollution Protection training.

3.10 Non-Stormwater Discharges

The MS4 Permit prohibits discharges of anything but storm water to the MS4. Field Inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm drain are prohibited, including storm drain connections from indoor drains or sinks. These are known as illicit connections and must be eliminated.

Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm drains, catch basins, and other

conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures to help prevent non-storm water discharges will be implemented:

1. Provide well marked proper disposal or collection methods for solid or liquid waste.
2. Train employees in proper disposal of non-storm water discharges. Employees will be educated to understand that storm drains connect directly to waterways without treatment.
3. Label all storm drain inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm drain system.
4. Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-storm water discharges.
5. Periodically inspect and maintain storm drain inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm systems.
6. Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.
7. Check for possible pollutants at the storm water outfall locations and identify the pollutant to correct the situation.

3.11 Waste, Garbage and Floatable Debris

Solid waste dumpster and garbage receptacles have been placed around the site and in the buildings for the collection of garbage. The lids must be kept closed on the outside receptacles. Employees are encouraged to keep the areas they are working in, clean and waste/garbage free. Debris on the site will be picked up along with catch basin and storm sewer systems cleaned out on a regular bases.

The collected waste, garbage and debris will be removed and disposed of at approved locations.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

The site is in a rural setting. The drives and material storage and staging are covered with materials that control dust generation and also eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

For the routine facility inspections and the comprehensive site inspections to be performed at your site, include a description of the following:

- The names of the person(s), or the positions of the person(s), responsible for inspection: The facility manager or a City of Oberlin representative.

- The schedules to be used for conducting inspections. Routine Facility Inspections are to be conducted quarterly, unless otherwise specified in Part 8 sector-specific requirements, and comprehensive site inspections are to be conducted annually: Routine facility inspections shall be performed once per calendar quarter, and comprehensive site inspections shall be performed once yearly. The comprehensive site inspection may be used for one of the routine inspections and

- Specific areas of the facility to be inspected, including schedules for specific outfalls:
  Routine facility inspections shall include inspection of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. salt shed, fueling location, outdoor stockpiles, storage buildings/sheds, vehicles), and of all storm water control measures used on site (i.e. catch basins, bioretention cell, detention basins, oil/water separator, greenbelt strips).

  Comprehensive site inspections shall consist of an inspection of the entire site including all areas reviewed for routine facility inspections, areas where spills and leaks have occurred in the past three years, and a review of monitoring data collected by the quarterly visual assessments. Inspectors shall also examine the following:

  - Industrial materials, residue, or trash that may have or could come into contact with storm water
  - Leaks or spills from industrial equipment, drums, tanks, and other containers
  - Offsite tracking of industrial or waste material, or sediment where vehicles enter or exit the site
  - Tracking or blowing of materials (including waste) from areas of no exposure to exposed areas
  - Storm water control measures needing replacement, maintenance, or repair

  Storm water controls measures shall be observed to ensure they are functioning correctly. If discharge locations are inaccessible, nearby downstream locations shall be inspected.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Jennifer Reeves Title: Stormwater Coordinator

Signature: Date: 3/24/22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS

Date of Revision	Section	Description
6/5/2019		Updated NPDES Permit No.
7/27/2021	1.1	Subsector code table updated for composting due to a permit change
7/27/2021	1.1	Added permit number and Lorain Country SWMD as the MS4
11/9/2021	4.0	Visual inspection requirement removed.
3/21/2022	1.2	Updating Contact information
3/21/2022	1.3	Updating Stormwater Team

SWPPP ATTACHMENTS

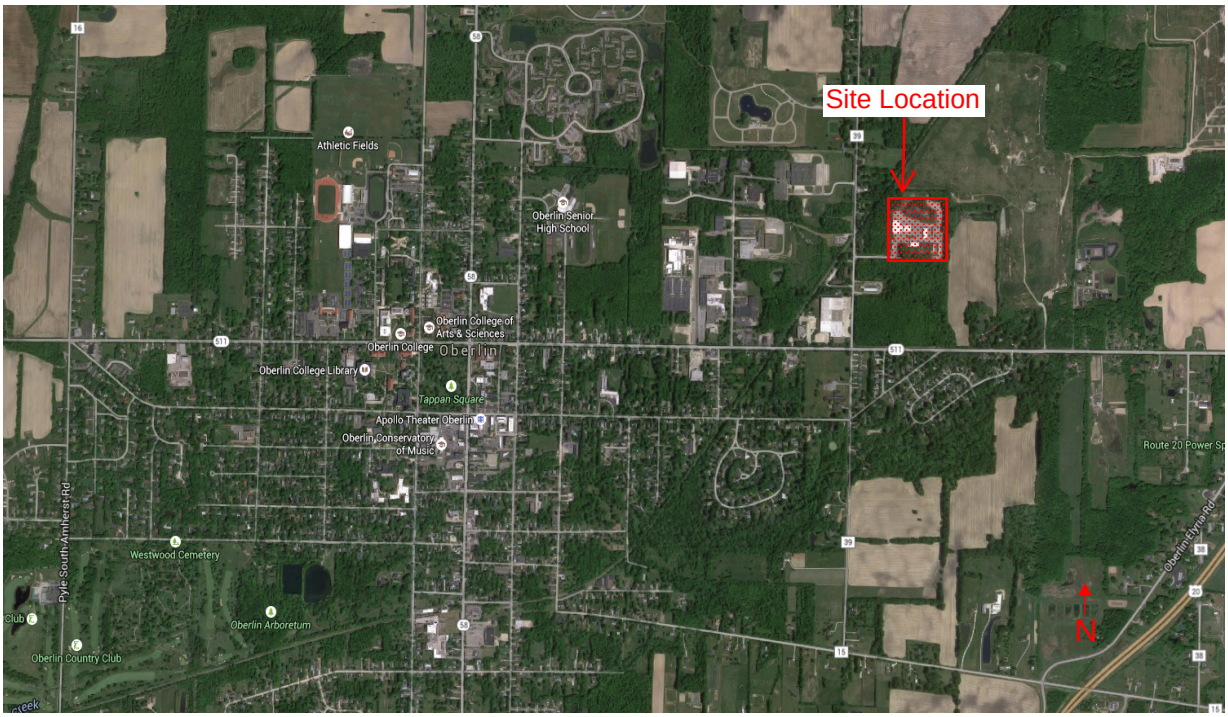
Attachment A – General Location Map

Attachment B – Site Map

Attachment C – Ohio EPA NPDES Permit #OHR000006

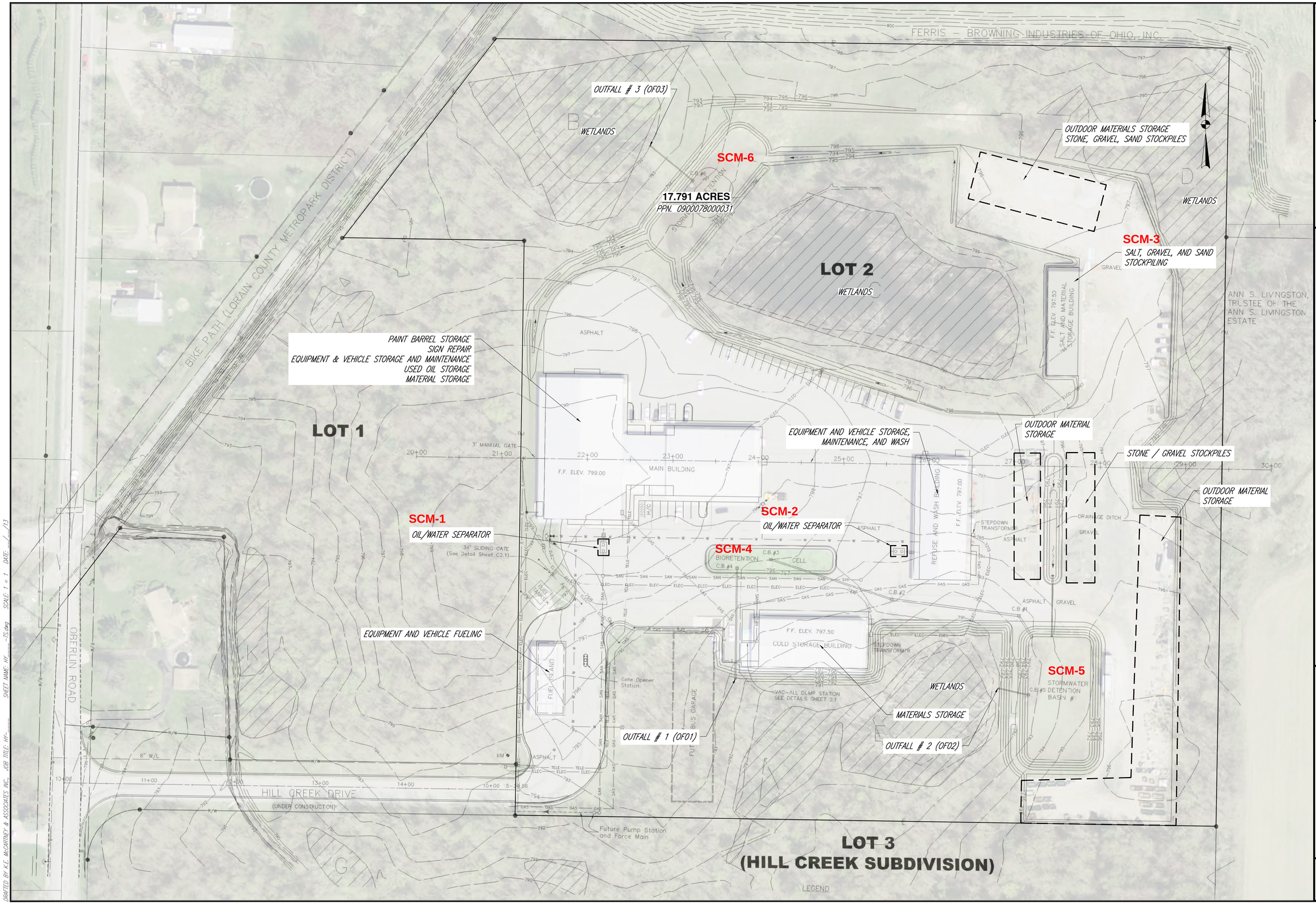
Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)

Attachment A – General Location Map



City of Oberlin Service Complex

Attachment B – Site Map



KEM
K.E. McCARTNEY & ASSOCIATES
ENGINEERS · PLANNERS · SURVEYORS

0 25 50 100
HORIZONTAL SCALE IN FEET

SITE PLAN - OBERLIN SERVICE COMPLEX

ATTACHMENT B

X
X

DRAFTED BY K.E. McCARTNEY & ASSOCIATES INC., JOB TITLE: HY-____ SHEET NAME: HY-____-TS.dwg SCALE: 1 = 1 DATE: __/__/13

Attachment C – Ohio EPA NPDES Permit #OHR000006

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

Attachment D – *Inspection Forms*

Comprehensive Site Inspection

Routine Facility Inspection

Miscellaneous Forms

NPDES Permit Tracking No.:
N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name:

2. NPDES Permit Tracking No.: N/A

3. Facility Physical Address:

a. Street:

b. City: c. State: d. Zip Code: -

4. Lead Inspectors Name: Title:

Additional Inspectors Name(s):

5. Contact Person: Title:

Phone: - - Ext. E-mail:

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
N/A

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:

N/A

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

N	/	A							

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
N/A

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ___ of ___ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: __/__/____

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: __/__/____

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
N/A

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Title:

Signature: Date Signed:

Oberlin Service Complex
Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name			
NPDES Tracking No.			
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information

Weather at time of this inspection?
❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature:

Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No
If yes, describe:

Are there any discharges occurring at the time of inspection? ❑Yes ❑No
If yes, describe:

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Oil/Water Separator 1	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	Oil/Water Separator 2	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	Salt, Gravel and Sand Storage Building	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	Bioretention Cell	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
5	Stormwater Detention Basin 1	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6	Stormwater Detention Basin 2	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Material loading/unloading and storage areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	Equipment operations and maintenance areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	Fueling areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	Outdoor vehicle and equipment washing areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	Waste handling and disposal areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	Erodible areas/construction	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	Non-stormwater/ illicit connections	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	Salt storage piles or pile containing salt	❑Yes ❑No ❑ N/A	❑Yes ❑No	
9	Dust generation and vehicle tracking	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	(Other)	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Maintenance Form

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

STORMWATER POLLUTION PREVENTION PLAN

VILLAGE OF SOUTH AMHERST

Facility:
Fire Station
103 W. Main Street
South Amherst, OH 44001
(440) 986-5901

SWPPP Contact:
Dennis Hevener
Water Distribution I
(440) 320-8037
Lieut1331@yahoo.com

SWPPP Preparation Date:
08 / 07 / 2019

KEM
K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

Mansfield, OH - 52 N. Diamond Street, Mansfield, Oh 44902 P: 419.525.0093 F: 419.525.0635
Elyria, OH - 526 E. Broad St., Elyria, Oh 44035 P: 440.323.9608 F: 440.323.3644

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SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Fire Station

Street: 103 W. Main Street

City: South Amherst State: OH ZIP Code: 44001

County: Lorain

MS4 Permit Number: 3GQ10012*CG Facility Permit Number: N/A

MS4 Permittee Name: LORAIN CO STORM WATER MANAGEMENT DISTRICT

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude:
1. _ _ º _ _ ' _ _'' N (degrees, minutes, seconds)
2. _ _ º _ _ . _ _' N (degrees, minutes, decimal)
3. 41.357225º N (decimal)

Longitude:
1. _ _ º _ _ ' _ _'' W (degrees, minutes, seconds)
2. _ _ º _ _ . _ _' W (degrees, minutes, decimal)
3. -82.240985º W (decimal)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS
☒ Other (please specify): Google Maps

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 2.95 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☐ Yes ☒ No
If yes, name of MS4 operator: _____
Name(s) of water(s) that receive stormwater from your facility Squires Schramm Ditch

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No
If Yes, identify name of the impaired water (and segment, if applicable):_____
Identify the pollutant(s) causing the impairment:_____
For pollutants identified, which do you have reason to believe will be present in your discharge? _____

For pollutants identified, which have a completed TMDL? _____

Description of Municipal Activities at this Facility: Maintenance Garage, Service Yard, Impound Lot

Subsector(s) (choose all that apply): P1

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Compost Yard, Leaf Collection Yard	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

1.2 Contact Information/Responsible Parties

MS4 Facility Operator(s):

Name: Village of South Amherst
Address: 103 W. Main St.
City, State, Zip Code: South Amherst, OH 44001
Telephone Number: (440) 986-2202
Email address: Lieut1331@yahoo.com
Fax number: (440) 986-8037

MS4 Facility Owner(s):

Name: Village of South Amherst
Address: 103 W. Main St.
City, State, Zip Code: South Amherst, OH 44001
Telephone Number: (440) 986-2202
Email address: Lieut1331@yahoo.com
Fax number: (440) 986-8037

MS4 SWPPP Contact:

Name: Dennis Hevener, Water Distribution I
Telephone number: (440) 320-8037
Email address: Lieut1331@yahoo.com
Fax number: (440) 986-8037

1.3 Stormwater Pollution Prevention Team

Staff Names	Phone	Email	Individual Responsibilities
Dave Leshinski	(440) 986-8221	mayors.amherst@gmail.com	Mayor, general oversight
Dennis Hevener	(440) 320-8037	Lieut1331@yahoo.com	Water Dist. I, facility manager

1.4 Activities at the Facility

Building / Site Location	Industrial Activity
Fire Station	Vehicle & Equipment Maintenance, Vehicle & Equipment Washing
Parking Lot	Outdoor Vehicle/Equipment Storage
Fueling Station	Fueling

1.5 General Location Map

The general location map for this facility can be found in Appendix A.

1.6 Site Plan

A copy of the site plan for this MS4 facility can be found in Appendix B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Fueling	Fuel, oil, heavy metals
Vehicle/Equipment Washing & Maintenance	Oil, arsenic, detergents, heavy metals, organics, chlorinated solvents, acid/alkaline wastes, ethylene glycol, phosphorus, salts, suspended solids
Outdoor Vehicle/Equipment Storage	Fuel, oil, hydraulic fluids, arsenic, heavy metals, organics

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Waste Dumpster	Outfall 1
Equipment Storage Area	Outfall 1
Fueling Area	Outfall 2
Vehicle Storage Area	Outfall 2

Description of Past Spills/Leaks

Date	Description	Outfalls
	No spills recorded	

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation:
  4/3/19

- Description of the evaluation criteria used:
  Routine Facility Inspection

- List of the outfalls or onsite drainage points that were directly observed during the evaluation:
  Outfall 1 & Outfall 2 (See Appendix B for locations)

- Different types of non-stormwater discharge(s) and source locations:
  No non-stormwater discharges were observed.

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified:
  No unauthorized discharges were identified.

2.4 Salt Storage

There is no salt storage at the facility.

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the greatest extent practical. The following list of control measures/BMPs for each industrial activity are implemented to minimize the exposure to rain, snow, snowmelt and runoff:

Fueling:

- Fueling hoses with check valves are used to prevent hose drainage after filling.
- A spill kit is located within the fueling area for immediate spill/leak cleanup.
- The fuel tanks are double walled, which provides secondary containment.
- A leak detection system is integrated with the fuel tanks.
- The fueling area is surrounded by posts and fencing to prevent collision during ingress/egress.
- Dry cleanup methods are used.
- Tanks are regularly inspected using a preventative maintenance approach.
- A grass filter strip is located around the site to treat stormwater runoff discharging from the site.

Vehicle/Equipment Maintenance:

- Maintenance is conducted inside the Fire Station building within service bays.
- The service bays have floor drains which capture spills/leaks, pass through an oil/water separator and are routed to the sanitary sewer.

Outdoor Vehicle/Equipment Storage:

- Fleet vehicles are stored inside buildings. Any spills/leaks are captured by floor drains, which are routed through an oil/water separator and to the sanitary sewer.
- Outdoor equipment storage is located near a grass filter strip to help remove pollutants from any spills/leaks that might occur.

Vehicle/Equipment Washing:

- Washing is handled inside the Fire Station building within service bays.
- The service bays have floor drains which capture spills/leaks, pass through an oil/water separator and are routed to the sanitary sewer.

Material Storage:

- Hazardous materials are stored inside a building.
- A grass filter strip is located around the site to treat stormwater runoff discharging from the site.

Figure 1 – Fueling Station

Figure 2 – Outdoor Equipment Storage

Figure 3 – Aggregate Stockpile

Figure 4 – Equipment Storage Building

The following list of control measures/BMPs for each industrial activity shall be utilized to minimize exposure to rain, snow, snowmelt and runoff:

Fueling:

- Install a berm/dike around the fueling station to prevent stormwater from entering.
- Install a roof or canopy over the fueling station to prevent rain/snow from entering. The cover should extend beyond the spill containment area.
- Use hoses with check valves to prevent hose drainage after filling.

Outdoor Vehicle/Equipment Storage:

- Store vehicles/equipment indoors whenever possible.
- Install a berm/dike or grassed swale around the storage area's perimeter to prevent stormwater from entering the area.
- Use drip pans under all vehicles and equipment waiting for maintenance.
- Use dry cleanup methods for spills/leaks.
- Regularly inspect storage areas to ensure BMPs are implemented

Material Storage:

- Store materials indoors or cover exposed materials with a roof or tarp.
- Install a berm/dike around the storage area's perimeter to prevent stormwater from entering.

3.2 Good Housekeeping

The intent of good housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which help to reduce the potential of polluting storm water. The following list of control measures/BMPs shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights that are easily accessible.
- Keep an organized inventory of materials used at the facility.
- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation.
- Make sure items are stored away from areas where a greater chance of an accident can occur.
- Refill materials in secondary containments or indoors.
- Look to install leak detection devices, overflow controls and diversion berms.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or nontoxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up leaks and spills promptly.
- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.
- Drain parts of any fluids prior to disposal.

3.3 Maintenance

It is important to properly inspect and maintain equipment, vehicles and systems, including the grass filter strip, storm sewer, sanitary sewer, oil/water separator and fueling station associated with the facility to detect potential issues that may cause pollutants to enter the storm system. Grassed areas shall be mowed and cleaned of debris. The storm sewer system shall be inspected yearly and after major storm events. The oil/water separator shall be inspected yearly and cleaned as needed to ensure it works properly.

Figure 6 – Oil/Water Separator Cleanout

3.4 Spill Prevention and Response

When a spill does occur, quick and effective response will prevent pollutants from reaching storm water. Spills will be cleaned up promptly and not allowed to evaporate so that pollutants do not remain on the pavement to be washed to the storm drains with the next rain or remain in the soil to become a possible groundwater pollutant. If the spill is on an unpaved surface, determine whether the contaminated soil should be removed to prevent it from being a source of future stormwater pollutants. Spill procedures will also include cleaning up leaks, drips, and other spills without water whenever possible. It is important to make sure that all the material is picked up and that the cleanup waste is properly disposed of and stored until removed.

Spill prevention and response procedures for hazardous materials stored or handled onsite will follow the procedures described in the facility Hazardous Materials Management Plan. Responsible personnel will contain and collect the spilled substance, then dispose of the substances and any contaminated soil in compliance with local hazardous materials regulations.
With any spill it is important to determine the scope of spill and follow the appropriate procedure outlined below. Non-hazardous spills can be categorized as small spills, medium spills and large spills.

- Small spills: These are spills that can be wiped up with a shop rag. Wet rags will not be put in the dumpster with the shop trash. They will be stored in a covered bin like the kind used at auto service stations. Used rags will be sent to a professional cleaning service or disposed of with the hazardous wastes if necessary.

- Medium-sized spills: These are spills too large to wipe up with a rag. Medium sized spills will be contained and soaked up using dry absorbent material such as: Vermiculite, specially prepared sawdust, or kitty litter. Absorbent snakes may be used as temporary brooms to contain and soak up the liquid. Used absorbent material will be swept up or collected and will be disposed of with the shop trash if non-hazardous or with the hazardous wastes if necessary. A wet/dry shop vacuum cleaner may also be used to collect spills and dispose of the liquid with hazardous wastes. Vacuums will not be used for gasoline, solvents, or other volatile fluids, because the enclosed vacuum may become an explosive hazard.

- Large spills: Spills of non-hazardous liquids will be contained and cleaned using a minimum amount of wash water. Storm sewer inlets or sewer inlets will be plugged to prevent the spill from entering the MS4. Temporary plugs will be kept onsite for the facility inlets and employees will be trained in when and how to use them.

- Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, 40 CFR Part 302, occurs during a 24-hour period, you shall notify the Ohio EPA Division of Emergency and Remedial Response at (800)282-9378 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. Contact information shall be in locations that are readily accessible and available.

A Spill/Release Incident Reporting form should be filled out promptly after a spill or release and kept for OEPA auditing.

It is important that every employee is aware of the spill prevention, control and cleanup procedures. Training sessions for the employees along with mock spill response sessions should be conducted on an annual basis to prepare employees for real spills. There shall be spill response kits in all buildings and outdoors near fueling or loading stations. Spill response kits should contain:

- Absorbents
- Broom/dust pan
- Shovel
- Berms/socks
- Paper or cloth towels
- Safety goggles and gloves
- Phone numbers for appropriate cleanup authorities

The spill kits must be replenished soon after usage and checked at regular intervals. There will also be "Spill Response Procedures" posters posted around the facility.

3.5 Erosion and Sediment Controls

A grass filter strip surrounds the impervious surfaces at the rear and sides of the site. These grassed areas have been seeded and mulched per ODNR's Rainwater and Land Development manual. Where industrial activities are conducted, the slope is minimal. The South end of the site drops off into a ditch. This steep bank is heavily vegetated, which helps prevent erosion. Both outfalls at the facility have rock outlet protection but are not functioning properly. These flow dissipation devices assist in reducing erosion and settling out harmful pollutants at the outlets. To ensure effective operation the rock outlet protection should be repaired/reinstalled according to ODNR's Rainwater & Land Development manual. A control measure/BMP such as a berm/dike, silt fence, wattle or sediment trap should be installed around outdoor material storage areas to prevent sediment from leaving the area.

Figure 7 – Outfall 1

Figure 8 – Outfall 2

3.6 Management of Runoff

A series of catch basins located around the facility capture stormwater runoff from the site. A grass filter strip surrounds impervious surfaces at the rear and sides of the site. The slope of the site allows stormwater runoff not captured by the catch basins to pass through these grassed areas, which helps filter out pollutants.

3.7 Salt Storage Piles or Piles Containing Salt

There are no salt storage piles or piles containing salt at the facility.

3.8 Sector-Specific Non-Numeric Effluent Limits

Sector-specific control measures/BMPs are included in their relevant sections of this document.

3.9 Employee Training

Successful stormwater pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the facility. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm sewer, since the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm sewer so that they understand the importance of preventing stormwater pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel and shall address:
    - Used oil and spent solvent management
    - Fueling procedures
    - General good housekeeping practices
    - Proper painting procedures
    - Used battery management
- New personnel will be required to review and understand this document prior to initiating work activities.

- Retraining will be completed, if violations continue to occur.
- Informational material shall be displayed to remind workers of BMPs.
- Contractors working for the municipality at the facility shall be required to complete pollution protection training.

3.10 Non-Stormwater Discharges

The MSGP Permit prohibits discharges of anything but storm water to the MS4. Field inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm sewer are prohibited, including storm sewer connections from indoor drains or sinks. These are known as illicit connections and must be eliminated.

Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm sewers inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm sewers, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures will be implemented to help prevent non-stormwater discharges:

- Provide well marked proper disposal or collection methods for solid or liquid waste.
- Train employees in proper disposal of non-stormwater discharges. Employees will be educated to understand that storm sewers connect directly to waterways without treatment.
- Label all storm sewer inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm sewer system.
- Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-stormwater discharges.
- Periodically inspect and maintain storm sewer inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm sewer system.
- Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.
- Check for possible pollutants at the stormwater outfall locations and identify the pollutant to correct the situation.

The following are non-stormwater discharges authorized under the NPDES Permit #OHR000006, provided the non-stormwater component of the discharge is in compliance with Part 2.1.2.10:

- Discharges from fire-fighting activities (not planned exercises)
- Fire hydrant flushing
- Potable water, including water line flushing
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outdoor storage of refrigerated gases or liquids
- Irrigation drainage
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling

- Pavement wash waters where no detergents or hazardous cleaning products are used (e.g., bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols), and the wash waters do not come into contact with oil and grease deposits, sources of pollutants associated with industrial activities, or any other toxic or hazardous materials, unless residues are first cleaned up using dry clean-up methods (e.g., applying absorbent materials and sweeping, using hydrophobic mops/rags) and you have implemented appropriate control measures to minimize discharges of mobilized solids and other pollutants (e.g., filtration, detention, settlement)
- Routine external building washdown/power wash water that does not use detergents or hazardous cleaning products (e.g., those containing bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols)
- Uncontaminated ground water or spring water
- Foundation or footing drains where flows are not contaminated with process materials
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from the cooling tower (e.g., “piped” cooling tower blowdown or drains)

3.11 Waste, Garbage and Floatable Debris

Solid waste dumpsters and garbage receptacles have been placed around the site and in the buildings for the collection of garbage. Lids must be kept closed on the outdoor receptacles. Waste material shall be picked up on a regular schedule, set by the Village with additional pickups as needed. Storage containers shall be inspected yearly at a minimum, along with vehicles and equipment that are used regularly. Stored vehicles and equipment shall be continuously inspected for leaks.

Figure 5 – Waste Dumpster with Lid

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

The site is in an urban setting. The drives and material storage and staging are covered with suitable materials that control dust generation and eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

A Routine facility inspection shall be conducted annually at the facility.

Routine facility inspections
Conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. vehicle, equipment and material storage areas and fueling station), and all stormwater control measures used on site (i.e. catch basins, Outfall 1 and Outfall 2, oil/water separator). Routine facility inspections shall be conducted at least annually (i.e., once each calendar year) although in many instances, more frequent inspection (e.g., monthly) may be appropriate for some types of equipment, processes, and control measures or areas of the facility with significant activities and materials exposed to storm water. Perform these inspections during periods when the facility is in operation and by qualified personnel with at least one member of your stormwater pollution prevention team participating.

Document the findings of each routine facility inspection performed and maintain this documentation onsite with the SWPPP. At a minimum, the documentation of each routine facility inspection shall include:

- The inspection date and time
- The name(s) and signature(s) of the inspector(s)
- Weather information and a description of any discharges occurring at the time of the inspection
- Any previously unidentified discharges of pollutants from the site
- Any control measures needing maintenance or repairs
- Any failed control measures that need replacement
- Any incidents of noncompliance observed
- Any additional control measures needed to comply with the permit requirements.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: DAVID J LESHINSKI Title: MAYOR

Signature: David J. Leshinski Date: 3-9-2022

DENNIS HEUENER

Dennis H Heuener 3-10-22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS		
Date of Revision	Section(s)	Description
7/27/2021	1.1	Subsector code table updated for composting due to a permit change.
11/8/2021	5.0	Visual inspection removed and routine inspection requirement changed to annually.
11/8/2021	4.0	Visual inspection requirement removed.

SWPPP APPENDICES

Appendix A – General Location Map

Appendix B – Site Plan

Appendix C – Ohio EPA NPDES Permit #OHR000006

Appendix D – Inspection Forms

APPENDIX A - GENERAL LOCATION MAP

U.S. DEPARTMENT OF THE INTERIOR
U.S. GEOLOGICAL SURVEY

The National Map US Topo

OBERLIN QUADRANGLE
OHIO-LORAIN CO.
7.5-MINUTE SERIES

Produced by the United States Geological Survey

North American Datum of 1983 (NAD83)
World Geodetic System of 1984 (WGS84). Projection and 1 000-meter grid: Universal Transverse Mercator, Zone 17T
10 000-foot ticks: Ohio Coordinate System of 1983 (north zone)

This map is not a legal document. Boundaries may be generalized for this map scale. Private lands within government reservations may not be shown. Obtain permission before entering private lands.

Imagery.....NAIP, October 2015
Roads.....U.S. Census Bureau, 2015 - 2016
Names.....GNIS, 2016
Hydrography.....National Hydrography Dataset, 2015
Contours.....National Elevation Dataset, 2010
Boundaries.....Multiple sources; see metadata file 1972 - 2016
Public Land Survey System.....BLM, 2013
Wetlands.....FWS National Wetlands Inventory 1977 - 2014

UTM GRID AND 2015 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

U.S. National Grid
100,000-m Square ID
Grid Zone Designation 17T

SCALE 1:24 000

1 KILOMETERS 0.5 0 1 2
1000 500 0 METERS 1000 2000
1 0.5 0 1
MILES
1000 0 1000 2000 3000 4000 5000 6000 7000 8000 9000 10000
FEET

CONTOUR INTERVAL 5 FEET
NORTH AMERICAN VERTICAL DATUM OF 1988

This map was produced to conform with the National Geospatial Program US Topo Product Standard, 2011. A metadata file associated with this product is draft version 0.6.19

OHIO
QUADRANGLE LOCATION

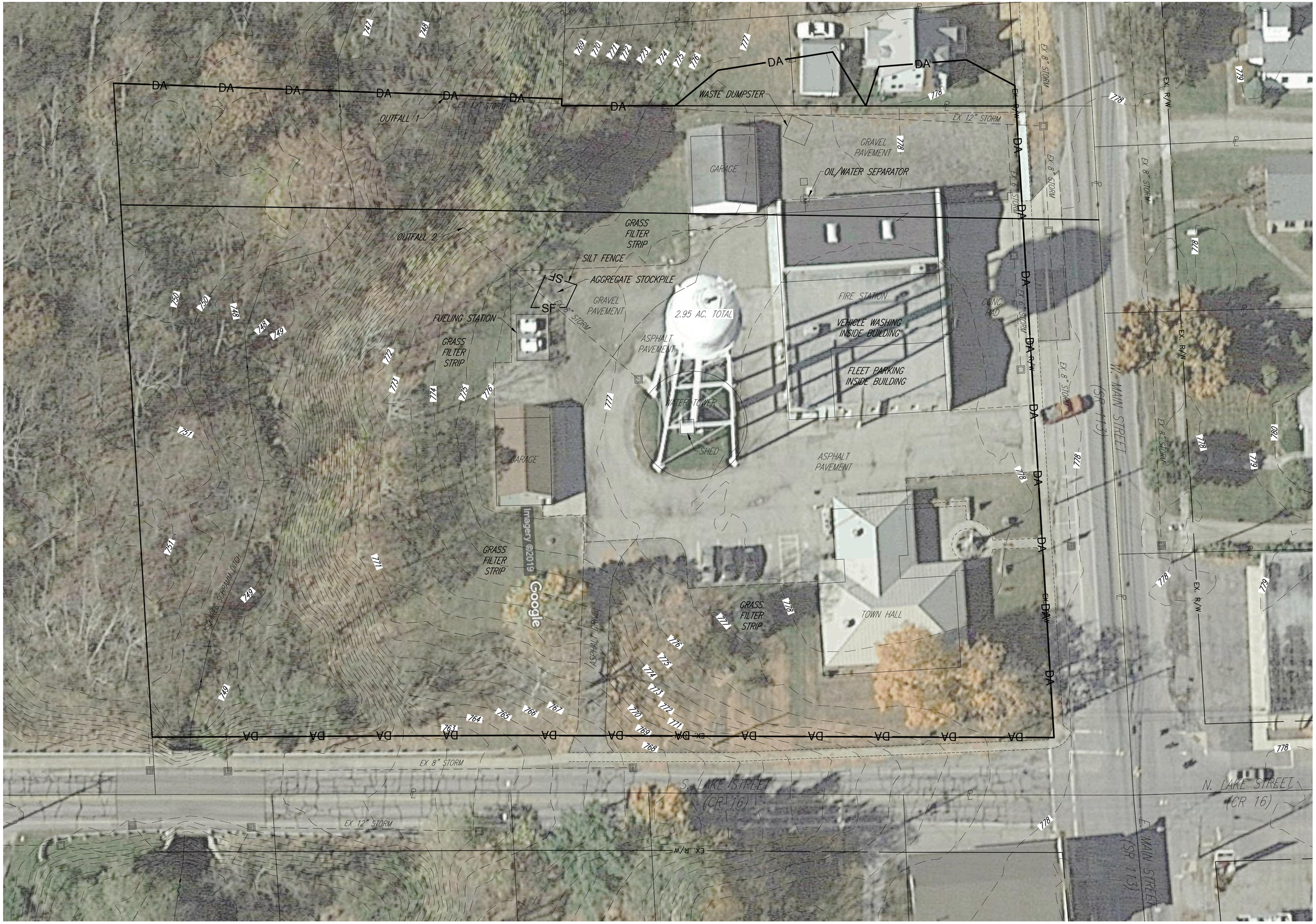
ROAD CLASSIFICATION
Expressway
Secondary Hwy
Ramp
Local Connector
Local Road
4WD
Interstate Route
US Route
State Route

1	2	3
4		5
6	7	8

1 Vermilion East
2 Lorain
3 Avon
4 Kipton
5 Grafton
6 Brighton
7 Wellington
8 Lagrange
ADJOINING QUADRANGLES

OBERLIN, OH
2016

NSN 7643-01-524-2828
NOAA REF. NO. USGS 24128 08



0 20 40
HORIZONTAL SCALE IN FEET

K.E. McCARTNEY & ASSOCIATES
ENGINEERS · PLANNERS · SURVEYORS

Village of South Amherst
Home of the World's Largest Sandstone Quarries

FIRE STATION

103 W. MAIN ST., SOUTH AMHERST, OH 44001

PROJECT NUMBER	DRAWN BY	CHECKED BY
SM-125	AEA	MWR

SHEET NAME

APPENDIX B
SITE PLAN

SHEET NUMBER

1 / 1

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

NPDES Permit Tracking No.:
OHR000006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Fire Station

2. NPDES Permit Tracking No.: OHR000006

3. Facility Physical Address:

a. Street: 103 West Main Street

b. City: South Amherst c. State: OH d. Zip Code: 44001-

4. Lead Inspectors Name: Dennis Hevener Title: Water Distribution I

Additional Inspectors Name(s):

5. Contact Person: Dennis Hevener Title: Water Distribution I

Phone: 440 - 320 - 8037 Ext. E-mail: Lieut1331@yahoo.com

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
OHR000006

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:
OHR000006

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
OHR000006

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
OHR000006

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ☐☐ of ☐☐ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: ☐☐/☐☐/☐☐☐☐

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: ☐☐/☐☐/☐☐☐☐

10. Date correction action completed: ☐☐/☐☐/☐☐☐☐ or expected to be completed: ☐☐/☐☐/☐☐☐☐

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
OHR000006

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: _____ Title: _____

Signature: _____ Date Signed: _____

South Amherst Fire Station
Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Fire Station		
NPDES Tracking No.	OHR000006		
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information

Weather at time of this inspection?
❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature:

Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No
If yes, describe:

Are there any discharges occurring at the time of inspection? ❑Yes ❑No
If yes, describe:

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Oil/Water Separator	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	Grass Filter Strip	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	Rock Outlet Protection	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	Silt Fence	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
5		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Fueling Station	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	Vehicle/Equipment Wash Area	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	Vehicle/Equipment Maintenance Area	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	Outdoor Vehicle Storage Area	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	Outdoor Equipment Storage Area	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	Aggregate Stockpile	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7		❑Yes ❑No ❑ N/A	❑Yes ❑No	
8		❑Yes ❑No ❑ N/A	❑Yes ❑No	
9		❑Yes ❑No ❑ N/A	❑Yes ❑No	
10		❑Yes ❑No ❑ N/A	❑Yes ❑No	
11		❑Yes ❑No ❑ N/A	❑Yes ❑No	
12		❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

STORMWATER POLLUTION PREVENTION PLAN

VILLAGE OF SOUTH AMHERST

Facility:
Maintenance Garage
517 W. Main Street
South Amherst, OH 44001
(440) 986-5901

SWPPP Contact:
Dennis Hevener
Water Distribution I
(440) 320-8037
Lieut1331@yahoo.com

SWPPP Preparation Date:
08 / 07 / 2019

KEM
K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

Mansfield, OH - 52 N. Diamond Street, Mansfield, Oh 44902 P: 419.525.0093 F: 419.525.0635
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SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Maintenance Garage

Street: 517 W. Main Street

City: South Amherst State: OH ZIP Code: 44001

County: Lorain

MS4 Permit Number: 3GQ10012*CG Facility Permit Number: N/A

MS4 Permittee Name: Lorain Co Storm Water Management District

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude:
1. _ _ º _ _ ' _ _'' N (degrees, minutes, seconds)
2. _ _ º _ _ . _ _' N (degrees, minutes, decimal)
3. 41.352264º N (decimal)

Longitude:
1. _ _ º _ _ ' _ _'' W (degrees, minutes, seconds)
2. _ _ º _ _ . _ _' W (degrees, minutes, decimal)
3. -82.259029º W (decimal)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS
☒ Other (please specify): Google Maps

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 0.88 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☐ Yes ☒ No
If yes, name of MS4 operator: _____
Name(s) of water(s) that receive stormwater from your facility Unnamed Tributary to Beaver Creek

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No
If Yes, identify name of the impaired water (and segment, if applicable):_____
Identify the pollutant(s) causing the impairment:_____
For pollutants identified, which do you have reason to believe will be present in your discharge? _____

For pollutants identified, which have a completed TMDL? _____

Description of Municipal Activities at this Facility: Maintenance Garage, Service Yard

Subsector(s) (choose all that apply): P1

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Compost Yard, Leaf Collection Yard	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

1.2 Contact Information/Responsible Parties

MS4 Facility Operator(s):

Name: Village of South Amherst
Address: 103 W. Main St.
City, State, Zip Code: South Amherst, OH 44001
Telephone Number: (440) 986-2202
Email address: Lieut1331@yahoo.com
Fax number: (440) 986-8037

MS4 Facility Owner(s):

Name: Village of South Amherst
Address: 103 W. Main St.
City, State, Zip Code: South Amherst, OH 44001
Telephone Number: (440) 986-2202
Email address: Lieut1331@yahoo.com
Fax number: (440) 986-8037

MS4 SWPPP Contact:

Name: Dennis Hevener, Water Distribution I
Telephone number: (440) 320-8037
Email address: Lieut1331@yahoo.com
Fax number: (440) 986-8037

1.3 Stormwater Pollution Prevention Team

Staff Names	Phone	Email	Individual Responsibilities
Dave Leshinski	(440) 986-8221	mayors.amherst@gmail.com	Mayor, general oversight
Dennis Hevener	(440) 320-8037	Lieut1331@yahoo.com	Water Dist. I, facility manager

1.4 Activities at the Facility

Building / Site Location	Industrial Activity
Maintenance Garage	Vehicle/Equipment Maintenance, Vehicle/Equipment Washing
Gravel Parking Area	Outdoor Vehicle/Equipment Storage
Material Storage Area	Dirt, Mulch, Unwashed Aggregate & Miscellaneous Stockpiles

1.5 General Location Map

The general location map for this facility can be found in Appendix A.

1.6 Site Plans

Copies of the site plans for this MS4 facility can be found in Appendix B1 & B2.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Vehicle/Equipment Maintenance	Fuel, oil, heavy metals
Vehicle/Equipment Washing	Oil, arsenic, detergents, heavy metals, organics, chlorinated solvents, acid/alkaline wastes, ethylene glycol, phosphorus, salts, suspended solids
Outdoor Vehicle/Equipment Storage	Fuel, oil, hydraulic fluids, arsenic, heavy metals, organics
Material Stockpiling	Sediment

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Vehicle/Equipment Wash Area	Outfall 1
Material Stockpile Areas	Outfall 1
Equipment Storage Areas	Outfall 1
Vehicle Storage Area	Outfall 1

Description of Past Spills/Leaks

Date	Description	Outfalls
7/11/19	Small oil spill near vehicle/equipment wash area. Oil spilled during vehicle oil change	Outfall 1
7/11/19	Small oil spill near equipment storage area. Oil storage barrel overtopped.	Outfall 1

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation:
  4/3/19
- Description of the evaluation criteria used:
  Routine Facility Inspection
- List of the outfalls or onsite drainage points that were directly observed during the evaluation:
  Outfall 1 (See Appendix B1 for location)
- Different types of non-stormwater discharge(s) and source locations:
  No non-stormwater discharges were observed.
- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified:
  No unauthorized discharges were identified.

2.4 Salt Storage

There is no salt storage at the facility.

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the greatest extent practical. The following list of control measures/BMPs for each industrial activity are implemented to minimize the exposure to rain, snow, snowmelt and runoff:

Outdoor Vehicle/Equipment Storage:

- Outdoor equipment storage is located on a concrete containment pad surrounded by concrete barriers to prevent stormwater from entering the area.
- Outdoor equipment storage is located near a grass filter strip to help remove pollutants from any spills/leaks that might occur.

Material Storage:

- Hazardous materials are stored inside the maintenance garage.
- A grass filter strip is located around the site to treat stormwater runoff discharging from the site.

Figure 1 – Vehicle/Equipment Wash Area

Figure 2 – Outdoor Equipment Storage

Figure 3 – Outdoor Equipment Storage

Figure 4 – Aggregate & Mulch Stockpiles

Figure 5 – Miscellaneous Stockpiles

Figure 6 – Material Storage Area

The following list of control measures/BMPs for each industrial activity should be utilized to minimize exposure to rain, snow, snowmelt and runoff:

Vehicle/Equipment Washing:

- Wash vehicles/equipment indoors or on a grassed surface.
- Indoor wash areas should have floor drains which capture spills/leaks, pass through an oil/water separator and are routed to the sanitary sewer.

Outdoor Vehicle/Equipment Storage:

- Store vehicles/equipment indoors whenever possible.
- Install a berm/dike or grassed swale around the storage area's perimeter to prevent stormwater from entering the area.
- Use drip pans under all vehicles and equipment waiting for maintenance.
- Use dry cleanup methods for spills/leaks.

Material Storage:

- Store materials indoors or cover exposed materials with a roof or tarp.
- Install a berm/dike around the storage area's perimeter to prevent stormwater from entering.

3.2 Good Housekeeping

The intent of good housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which help to reduce the potential of polluting storm water. The following list of control measures/BMPs shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights that are easily accessible.
- Keep an organized inventory of materials used at the facility.
- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation.

- Make sure items are stored away from areas where a greater chance of an accident can occur.
- Refill materials in secondary containments or indoors.
- Look to install leak detection devices, overflow controls and diversion berms.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or nontoxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up leaks and spills promptly.
- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.
- Drain parts of any fluids prior to disposal.

Figure 7 – Outdoor Containers with Oil Residue

3.3 Maintenance

It is important to properly inspect and maintain equipment, vehicles and systems, including the vegetated swale, settling basin and stockpile areas associated with the facility to detect potential issues that may cause pollutants to enter the storm system. The vegetated swale and other grassed areas shall be mowed and cleaned of debris.

Figure 8 – Grassed areas need to be mowed and cleaned of debris

3.4 Spill Prevention and Response

When a spill does occur, quick and effective response will prevent pollutants from reaching storm water. Spills will be cleaned up promptly and not allowed to evaporate so that pollutants do not remain on the pavement to be washed to the storm drains with the next rain or remain in the soil to become a possible groundwater pollutant. If the spill is on an unpaved surface, determine whether the contaminated soil should be removed to prevent it from being a source of future stormwater pollutants. Spill procedures will also include cleaning up leaks, drips, and other spills without water whenever possible. It is important to make sure that all the material is picked up and that the cleanup waste is properly disposed of and stored until removed.

Spill prevention and response procedures for hazardous materials stored or handled onsite will follow the procedures described in the facility Hazardous Materials Management Plan. Responsible personnel will contain and collect the spilled substance, then dispose of the substances and any contaminated soil in compliance with local hazardous materials regulations.
With any spill it is important to determine the scope of spill and follow the appropriate procedure outlined below. Non-hazardous spills can be categorized as small spills, medium spills and large spills.

- Small spills: These are spills that can be wiped up with a shop rag. Wet rags will not be put in the dumpster with the shop trash. They will be stored in a covered bin like the kind used at auto service stations. Used rags will be sent to a professional cleaning service or disposed of with the hazardous wastes if necessary.

- Medium-sized spills: These are spills too large to wipe up with a rag. Medium sized spills will be contained and soaked up using dry absorbent material such as: Vermiculite, specially prepared sawdust, or kitty litter. Absorbent snakes may be used as temporary brooms to contain and soak up the liquid. Used absorbent material will be swept up or collected and will be disposed of with the shop trash if non-hazardous or with the hazardous wastes if necessary. A wet/dry shop vacuum cleaner may also be used to collect spills and dispose of the liquid with hazardous wastes. Vacuums will not be used for gasoline, solvents, or other volatile fluids, because the enclosed vacuum may become an explosive hazard.

- Large spills: Spills of non-hazardous liquids will be contained and cleaned using a minimum amount of wash water. Storm sewer inlets or sewer inlets will be plugged to prevent the spill from entering the MS4. Temporary plugs will be kept onsite for the facility inlets and employees will be trained in when and how to use them.

- Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, 40 CFR Part 302, occurs during a 24-hour period, you shall notify the Ohio EPA Division of Emergency and Remedial Response at (800) 282-9378 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. Contact information shall be in locations that are readily accessible and available.

A Spill/Release Incident Reporting form should be filled out promptly after a spill or release and kept for OEPA auditing.

It is important that every employee is aware of the spill prevention, control and cleanup procedures. Training sessions for the employees along with mock spill response sessions should be conducted on an annual basis to prepare employees for real spills. There shall be spill response kits in all buildings and outdoors near fueling or loading stations. Spill response kits should contain:

- Absorbents
- Broom/dust pan
- Shovel
- Berms/socks
- Paper or cloth towels
- Safety goggles and gloves
- Phone numbers for appropriate cleanup authorities

The spill kits must be replenished soon after usage and checked at regular intervals. There will also be "Spill Response Procedures" posters posted around the facility.

3.5 Erosion and Sediment Controls

A grass filter strip is located at the rear and sides of the site. These grassed areas have spots of exposed soil that need to be reseeded and mulched per ODNR's Rainwater and Land Development manual. Where industrial activities are conducted, the slope is minimal. The outfall at the facility is grassed but contains bare spots in need of repairment.

Figure 9 – Exposed Soil in Grassed Areas

A flow dissipation device, such as rock outlet protection, shall be installed at facility's outfall. These devices assist in reducing erosion and settling out harmful pollutants at the outlet. The rock outlet protection shall be installed according to ODNR's Rainwater & Land Development manual. A control measure/BMP such as a berm/dike, silt fence, wattle or sediment trap shall be installed around outdoor material storage/stockpile areas to prevent sediment from leaving the area. Soil stockpiles shall be seeded immediately after dirt moving activities have seized. Seeding and mulching shall follow ODNR's Rainwater & Land Development manual. A sediment settling basin shall be installed at the outfall to help control stormwater runoff leaving the facility, as shown in Appendix B1. The settling basin shall be maintained according to ODNR's Rainwater & Land Development manual.

Figure 10 – Outfall 1

Figure 11 – Soil Stockpile at Cemetery

3.6 Management of Runoff

A grass filter strip is located at the rear and sides of the site. The slope of the site allows stormwater runoff to pass through the grassed areas, which helps filter out pollutants. A vegetated swale shall be constructed along the West side of the site, as shown in Appendix B1. This swale shall be installed and maintained as described in ODNR's Rainwater and Land Development manual.

Figure 12 – Proposed Vegetated Swale Location

3.7 Salt Storage Piles or Piles Containing Salt

There are no salt storage piles or piles containing salt at the facility.

3.8 Sector-Specific Non-Numeric Effluent Limits

Sector-specific control measures/BMPs are included in their relevant sections of this document.

3.9 Employee Training

Successful stormwater pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the facility. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm sewer, since the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm sewer so that they understand the importance of preventing stormwater pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel and shall address:
    - Used oil and spent solvent management
    - Fueling procedures
    - General good housekeeping practices
    - Proper painting procedures
    - Used battery management
- New personnel will be required to review and understand this document prior to initiating work activities.
- Retraining will be completed, if violations continue to occur.
- Informational material shall be displayed to remind workers of BMPs.
- Contractors working for the municipality at the facility shall be required to complete pollution protection training.

3.10 Non-Stormwater Discharges

The MSGP Permit prohibits discharges of anything but storm water to the MS4. Field inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm sewer are prohibited, including storm sewer connections from indoor drains or sinks. These are known as illicit connections and must be eliminated. Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm sewers inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm sewers, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures will be implemented to help prevent non-stormwater discharges:

- Provide well marked proper disposal or collection methods for solid or liquid waste.
- Train employees in proper disposal of non-stormwater discharges. Employees will be educated to understand that storm sewers connect directly to waterways without treatment.
- Label all storm sewer inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm sewer system.
- Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-stormwater discharges.
- Periodically inspect and maintain storm sewer inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm sewer system.
- Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.
- Check for possible pollutants at the stormwater outfall locations and identify the pollutant to correct the situation.

The following are non-stormwater discharges authorized under the NPDES Permit #OHR000006, provided the non-stormwater component of the discharge is in compliance with Part 2.1.2.10:

- Discharges from fire-fighting activities (not planned exercises)
- Fire hydrant flushing
- Potable water, including water line flushing
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outdoor storage of refrigerated gases or liquids
- Irrigation drainage
- Landscape watering provided all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling
- Pavement wash waters where no detergents or hazardous cleaning products are used (e.g., bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols), and the wash waters do not come into contact with oil and grease deposits, sources of pollutants associated with industrial activities, or any other toxic or hazardous materials, unless residues are first cleaned up using dry clean-up methods (e.g., applying absorbent materials and sweeping, using hydrophobic mops/rags) and you have implemented appropriate control measures to minimize discharges of mobilized solids and other pollutants (e.g., filtration, detention, settlement)
- Routine external building washdown/power wash water that does not use detergents or hazardous cleaning products (e.g., those containing bleach, hydrofluoric acid, muriatic acid, sodium hydroxide, nonylphenols)
- Uncontaminated ground water or spring water
- Foundation or footing drains where flows are not contaminated with process materials
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from the cooling tower (e.g., “piped” cooling tower blowdown or drains)

3.11 Waste, Garbage and Floatable Debris

Garbage receptacles have been placed around the site and in the buildings for the collection of garbage. Lids must be kept closed on the outdoor receptacles. Waste material shall be picked up on a regular schedule, set by the Village with additional pickups as needed. Storage containers shall be inspected yearly at a minimum, along with vehicles and equipment that are used regularly. Stored vehicles and equipment shall be continuously inspected for leaks.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

The site is in an urban setting. The drives and material storage and staging are covered with suitable materials that control dust generation and eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

A Routine facility inspection shall be conducted annually at the facility.

Routine facility inspections
Conduct routine facility inspections of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. vehicle, equipment and material storage areas and fueling station), and all stormwater control measures used on site (i.e. catch basins, Outfall 1 and Outfall 2, oil/water separator). Routine facility inspections shall be conducted at least annually (i.e., once each calendar year) although in many instances, more frequent inspection (e.g., monthly) may be appropriate for some types of equipment, processes, and control measures or areas of the facility with significant activities and materials exposed to storm water. Perform these inspections during periods when the facility is in operation and by qualified personnel with at least one member of your stormwater pollution prevention team participating.

Document the findings of each routine facility inspection performed and maintain this documentation onsite with the SWPPP. At a minimum, the documentation of each routine facility inspection shall include:

- The inspection date and time
- The name(s) and signature(s) of the inspector(s)
- Weather information and a description of any discharges occurring at the time of the inspection
- Any previously unidentified discharges of pollutants from the site
- Any control measures needing maintenance or repairs
- Any failed control measures that need replacement
- Any incidents of noncompliance observed
- Any additional control measures needed to comply with the permit requirements.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: DAVID J LESHINSKI Title: MAYOR

Signature: David J. Leshinski Date: 3-9-2022

DENNIS HEUENER
Dennis Heuener 3-10-22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS		
Date of Revision	Section(s)	Description
7/27/2021	1.1	Subsector code table updated for composting due to a permit change.
11/8/2021	5.0	Visual inspection removed and routine inspection requirement changed to annually.
11/8/2021	4.0	Visual inspection requirement removed.

SWPPP APPENDICES

Appendix A – General Location Map

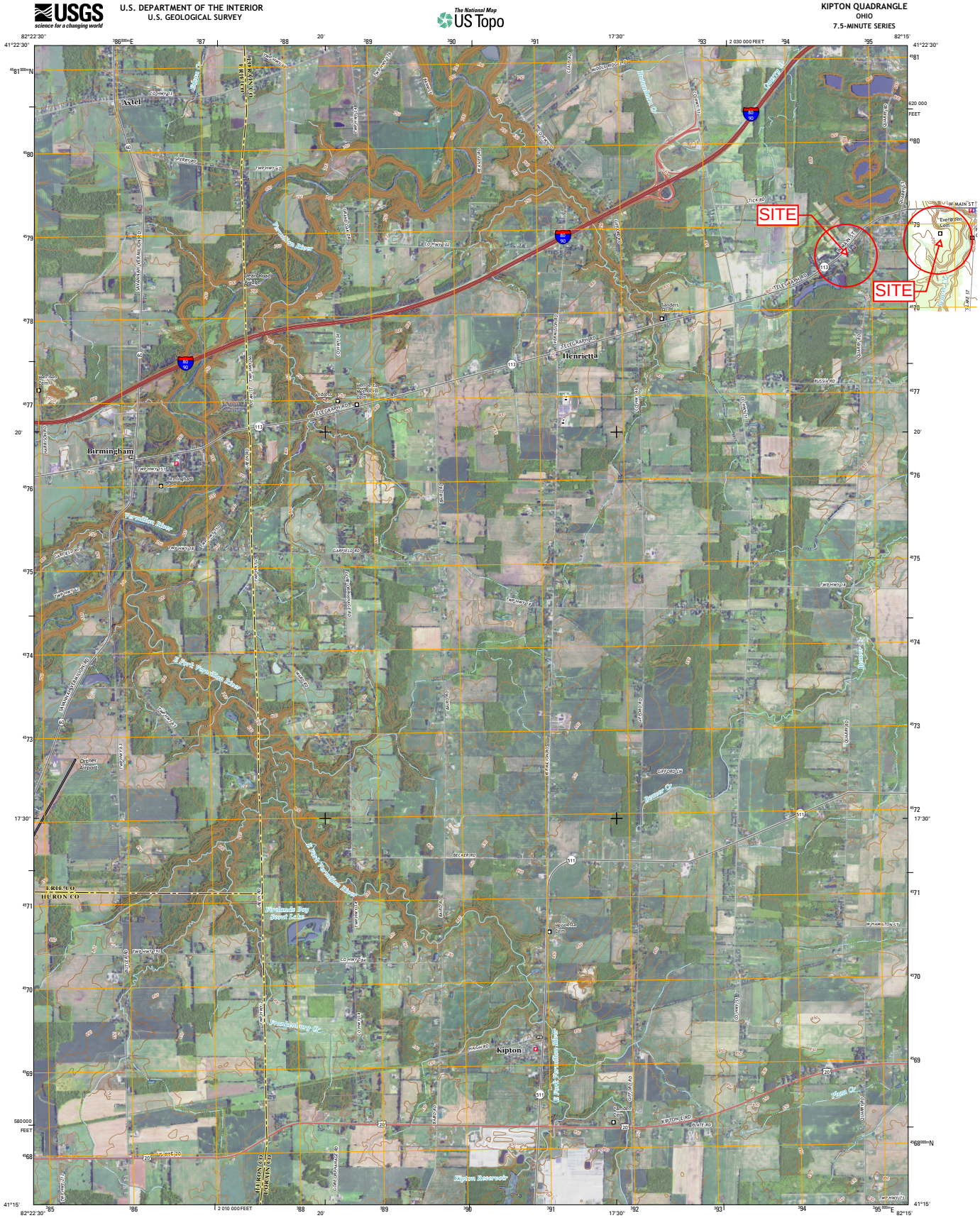
Appendix B1 – Maintenance Garage Site Plan

Appendix B2 – Cemetery Site Plan

Appendix C – Ohio EPA NPDES Permit #OHR000006

Appendix D – Inspection Forms

APPENDIX A - GENERAL LOCATION MAP



Produced by the United States Geological Survey

North American Datum of 1983 (NAD83)
World Geodetic System of 1984 (WGS84). Projection and
1 000-meter grid: Universal Transverse Mercator, Zone 17T
10 000-foot ticks: Ohio Coordinate System of 1983 (north zone)

This map is not a legal document. Boundaries may be generalized for this map scale. Private lands within government reservations may not be shown. Obtain permission before entering private lands.

Imagery.....NAIP, October 2015
Roads.....U.S. Census Bureau, 2015 - 2016
Names.....GNIS, 2016
Hydrography.....National Hydrography Dataset, 2015
Contours.....National Elevation Dataset, 2010
Boundaries.....Multiple sources; see metadata file 1972 - 2016
Public Land Survey System.....BLM, 2013
Wetlands.....FWS National Wetlands Inventory 1977 - 2014

UTM GRID AND 2015 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

U.S. National Grid
100,000-m Square ID
LF
Grid Zone Designation
17T

This map was produced to conform with the National Geospatial Program US Topo Product Standard, 2011. A metadata file associated with this product is draft version 0.6.19

NSN 7643013502762
NGA REF NO. USGS24K27708

MAINTENANCE GARAGE

517 W. MAIN ST., SOUTH AMHERST, OH 44001

APPENDIX B1
SITE PLAN

PROJECT NUMBER	DRAWN BY	CHECKED BY
SM-125	AEA	MWR

SHEET NAME

SHEET NUMBER 1 / 1

KEM
K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

Village of South Amherst
Home of the World's Largest Sandstone Quarries

HORIZONTAL SCALE IN FEET
0 20 40

N

0 20 40
HORIZONTAL SCALE IN FEET

K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

Village of South Amherst
Home of the World's Largest Sandstone Quarries

EVERGREEN CEMETERY
201 W. MAIN ST., SOUTH AMHERST, OH 44001

PROJECT NUMBER	DRAWN BY	CHECKED BY
SM-125	AEA	MWR

SHEET NAME

APPENDIX B2
SITE PLAN

SHEET NUMBER

1 / 1

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

NPDES Permit Tracking No.:
OHR000006

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Maintenance Garage

2. NPDES Permit Tracking No.: OHR000006

3. Facility Physical Address:

a. Street: 517 West Main Street

b. City: South Amherst c. State: OH d. Zip Code: 44001-

4. Lead Inspectors Name: Dennis Hevener Title: Water Distribution I

Additional Inspectors Name(s):

5. Contact Person: Dennis Hevener Title: Water Distribution I

Phone: 440 - 320 - 8037 Ext. E-mail: Lieut1331@yahoo.com

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
OHR000006

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:
OHR000006

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
OHR000006

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
OHR000006

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ☐☐ of ☐☐ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: ☐☐/☐☐/☐☐☐☐

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: ☐☐/☐☐/☐☐☐☐

10. Date correction action completed: ☐☐/☐☐/☐☐☐☐ or expected to be completed: ☐☐/☐☐/☐☐☐☐

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
OHR000006

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: _____ Title: _____

Signature: _____ Date Signed: _____

South Amherst Maintenance Garage
Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Maintenance Garage		
NPDES Tracking No.	OHR000006		
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information

Weather at time of this inspection?
❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds
❑ Other: Temperature:

Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No
If yes, describe:

Are there any discharges occurring at the time of inspection? ❑Yes ❑No
If yes, describe:

Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Grass Filter Strip	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	Vegetated Swale	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	Sediment Settling Basin	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	Rock Outlet Protection	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
5	Silt Fence	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6	Berm/Dike	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities exposed to stormwater

Below are some general areas that should be assessed during routine inspections. Customize this list as needed for the specific types of industrial materials or activities at your facility.

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	Outdoor Vehicle Storage	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	Vehicle/Equipment Maintenance Area	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	Outdoor Oil Containers	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	Outdoor Equipment Storage	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	Vehicle/Equipment Wash Area	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	Miscellaneous Stockpiles	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	Outdoor Material Storage Areas	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	Aggregate Stockpile	❑Yes ❑No ❑ N/A	❑Yes ❑No	
9	Mulch Stockpile	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	Dirt Stockpile (Cemetery)	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11		❑Yes ❑No ❑ N/A	❑Yes ❑No	
12		❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Maintenance Form

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Stormwater Pollution Prevention Plan

for:

Sheffield Township Maintenance Facility
5166 Clinton Avenue
Lorain, OH 44050

SWPPP Contact(s):

Road Department Superintendent
Dave Underwood
5166 Clinton Avenue
Lorain, OH 44050
440-277-6409

SWPPP Preparation Date:

05/ 2013

Rev. 4/13/16

Rev. 7/27/21

Rev. 11/8/21

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SECTION 1: MS4 FACILITY DESCRIPTION AND CONTACT INFORMATION

1.1 Facility Information

Facility Information

Name of Facility: Sheffield Township Maintenance Facility

Street: 5166 Clinton Ave

City: Lorain State: OH ZIP Code: 44050

County: Lorain

MS4 Permit Number: 3GQ10012*DG Facility Permit Number: N/A

MS4 Permittee Name: Lorain County Storm Water Management District

Latitude/Longitude (Use **one** of three possible formats, and specify method)

Latitude: Longitude:

1. 42 º 25 ' 24.16" N (degrees, minutes, seconds) 1. 82 º 07 ' 37.66" W (degrees, minutes, seconds)

Method for determining latitude/longitude (check one):

☐ USGS topographic map (specify scale:_____) ☐ EPA Web site ☐ GPS

☒ Other (please specify): Google Earth

Is this facility considered a Federal Facility? ☐ Yes ☒ No

Estimated area of industrial activity at site exposed to stormwater: 1.49 (acres)

Discharge Information

Does this facility discharge stormwater into an MS4? ☒ Yes ☐ No

If yes, name of MS4 operator: City of Lorain

Name(s) of water(s) that receive stormwater from your facility City of Lorain MS4 then to the Black River

Use the TMDL Community Identifier Table at www.neohiostormwater.com to answer the following:

Are any of your discharges directly into any segment of an impaired water? ☐ Yes ☒ No

If Yes, identify name of the impaired water (and segment, if applicable): _____

Identify the pollutant(s) causing the impairment: _____

For pollutants identified, which do you have reason to believe will be present in your discharge? _____

_____

For pollutants identified, which have a completed TMDL? _____

Use the table below or refer to Appendix D in Permit OHR000006 to answer the following;

Description of Municipal Activities at this Facility: Maintenance Garage / Service Yard

Subsector(s) (choose all that apply): P1

Subsector Codes for Typical Municipal Activities			
P1	Maintenance Garages, Service Yard, Bus Terminals, Solid Waste Transfer Station*, Impound Lot	T1	WWTPs
C6	Compost Yard, Leaf Collection Yard	J2	Concrete Recycling, Crushing
L1	Landfill, Snow Disposal Yard	N2	Source-Separated Recycling
O1	Steam Electric Power Plant	A4	Yard waste shredding, mulching
Q1	Shipping Port or Marina	S1	Airports

*If the transfer station is located at the landfill where the waste will be disposed, use Subsector L1.

1.2 Contact Information/Responsible Parties

Facility Operator (s):

Name: Sheffield Township Maintenance Facility
Address: 5166 Clinton Avenue
City, State, Zip Code: Lorain, OH 44050
Telephone Number: 440-277-6409
Email address:
Fax number: None

Facility Owner (s):

Name: Sheffield Township
Address: 5166 Clinton Avenue
City, State, Zip Code: Lorain, OH 44050
Telephone Number: 440-277-6409
Email address:
Fax number: None

SWPPP Contact:

Name: Dave Underwood
Telephone number: 440-277-6409
Email address:
Fax number: None

1.3 Stormwater Pollution Prevention Team

Staff Names	Individual Responsibilities
Dave Underwood	Road Department Superintendent

1.4 Activities at the Facility

The Sheffield Township Maintenance Facility is made up of a maintenance building, a covered salt storage shed, and multiple outdoor storage areas. The Sheffield Township Fire Department and offices for Township personnel are also located on site.

All of the industrial activities listed in section 2.1 are performed at the maintenance building except for any stockpiling. Salt stockpiling is performed in the salt storage shed. And outdoor areas are utilized for temporary stone, gravel, sand, etc. stockpiling and material storage.

1.5 General Location Map

A copy of the general location map for this facility is located in Attachment A.

1.6 Site Map

A copy of the site map for this facility is located in Attachment B.

SECTION 2: POTENTIAL POLLUTANT SOURCES

2.1 Industrial Activity and Associated Pollutants

Industrial Activity	Associated Pollutants
Equipment and Vehicle Storage	Fuel, antifreeze, oils
Equipment and Vehicle Maintenance	Fuel, antifreeze, oils
Temporary Stone, Gravel, Sand, etc. Stockpiling	Sediment
Salt Stockpiling	Salt
Materials Storage	Sediment and material particles
Used Oil Storage	Oils

2.2 Spills and Leaks

Areas of Site Where Potential Spills/Leaks Could Occur

Location	Outfalls
Salt Storage Shed	Catch Basin #7 and Ground Water
Stockpile Areas	Catch Basin #12 and Ground Water
Maintenance Areas	Catch Basin #12
Used Oil Storage Container	Catch Basin #12
Vehicle and Equipment Storage Areas	Catch Basin #12 & #7

Description of Past Spills/Leaks

Date	Description	Outfalls
	No Information	

2.3 Non-Stormwater Discharges Documentation

- Date of evaluation: 5/2/16
- Description of the evaluation criteria used: Routine Facility Inspection Report
- List of the outfalls or onsite drainage points that were directly observed during the evaluation: Catch Basin # 7 and Catch Basin #12
- Different types of non-stormwater discharge(s) and source locations: No non-stormwater discharges were observed.

  The following are acceptable non-storm water discharges (illicit discharges) only if they are not "significant contributors of pollutants to the MS4":

  - Water line flushing
  - Landscaping irrigation
  - Irrigation water
  - Diverted stream flows
  - Springs
  - Rising ground waters
  - Uncontaminated ground water infiltration
  - Uncontaminated pumped ground water
  - Flows from riparian habitats and wetlands
  - Discharges from potable water sources
  - Water from crawl space pumps
  - Foundation drains
  - Air conditioning condensation
  - Footing drains
  - Lawn watering
  - Individual residential car washing
  - Dechlorinated swimming pool discharges
  - Street wash water
  - Discharges or flows from fire fighting activities

- Action(s) taken, such as a list of control measures used to eliminate unauthorized discharge(s), if any were identified. *For example, a catch basin was re-routed to sanitary for provide an area to dewater catch basin cleanings, the discharge of leachate from composting is being collected and sprayed back onto the piles, or an NPDES permit application was submitted for an unauthorized illicit discharge:* N/A

2.4 Salt Storage

There is a covered salt storage shed with walls on three sides and a concrete floor.

2.5 Sampling Data Summary

No sampling was performed during the previous permit term.

SECTION 3: STORMWATER CONTROL MEASURES

3.1 Minimize Exposure

All activities in section 2.1 shall be located to minimize exposure to storm water and precipitation to the extent practical. Following is a list of special structural controls or practices that are implemented to minimized the exposure to rain, snow, snowmelt and runoff specific to the Sheffield Township Maintenance Facility:

- The salt stockpile is stored in a covered salt storage shed with a concrete floor, to help prevent polluted rainwater runoff from the salt stockpile and also infiltration to the ground water.
- The temporary top soil stockpile, has vegetation growing on it to help control sediment runoff and is surrounded by a green belt area.
- All yard waste goes to Brian Kyle's Landscaping after 30 days.
- Vehicle and equipment maintenance is done inside the maintenance building, the floor drains have been cemented closed so that any spills and leaks cannot get into the storm sewer system.
- Vehicles and equipment are stored under cover and on concrete pavement to control the potential of pollution, from spills and leaks.
- A vegetated swale is on site and treats some of the site discharge prior to entering the County storm sewer
- The used oil storage container is kept inside a second container, which is located in the maintenance building to protect against the possibility of pollution from a spill or leak.
- There are no old vehicle or equipment storage on site.
- The vehicles and equipment are washed inside the fire house building where the drains go to the oil/separator and then to the sanitary system.
- All trash is collected in covered dumpsters and picked on a regular basis.
- A vegetated berm was built along the backside of a temporary outdoor storage area to control runoff.

Figure 1 – Vegetated Swale

Figure 2 – Cemented Floor Drain

Figure 3 – Spill Kit

3.2 Good Housekeeping

The intent of Good Housekeeping practices is to maintain a clean and orderly work environment along with practices that reduce the chance of possible spills, which helps to reduce the potential of pollution of storm water. The following prevention measures shall be implemented throughout the site:

- Maintain sufficient aisle space in storage areas.
- Stack items at safe heights so as to be easily accessed.
- When working with liquids outdoors, cover all storm drains with mats or berms prior to beginning work.
- Do not overload pallets, shelves or transportation equipment.
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation.
- Make sure items are stored away from areas where the chance of an accident to occur is greater.
- Refill materials in secondary containments or indoors.
- Look to install leak detection devices, overflow controls and diversion berms.
- Recycle, reclaim or reuse material if possible.
- Replace toxic materials with less or non toxic products.
- Do not let scrap accumulate around work areas or storage areas.
- Clean up drips and spills promptly.

- Keep lids and covers closed tightly on all containers unless they are being used at the time.
- Ensure all containers are properly labeled.
- Place drip pans under small leaks until they can be permanently repaired.

Waste material shall be picked up on a regular schedule, set by the County or additional picks ups when needed. Storage containers shall be inspected, yearly at a minimum, along with equipment and vehicles being used regularly. Stored vehicles and equipment shall be continuously inspected for leaks.

Figure 4 – On-Site Dumpster

3.3 Maintenance

It is important to properly inspect and maintain equipment, vehicles and systems, including green areas, storm sewer associated with the Sheffield Township Maintenance Facility to detect potential issues that may cause pollutants to storm water. Green areas shall be mowed and cleaned of debris. The storm sewer system and catch basins shall be cleaned yearly or after major storm events.

3.4 Spill Prevention and Response

When a spill does occur, quick and effective response will prevent pollutants from reaching storm water. Spills will be cleaned up promptly and not allowed to evaporate so that pollutants do not remain on the pavement to be washed to the storm drains with the next rain or remain in the soil to become a possible groundwater pollutant. If the spill is on an unpaved surface, determine whether the contaminated soil should be removed to prevent it from being a source of future storm water pollutants. Spill procedures will also include cleaning up leaks, drips, and other spills without water whenever possible. It is important to make sure that all the material is picked up and that the cleanup waste is properly disposed of and stored until removed.

Spill prevention and response procedures for hazardous materials stored or handled onsite will follow the procedures described in the facility Hazardous Materials Management Plan. Responsible personnel will contain and collect the spilled substance, then dispose of the substances and any contaminated soil in compliance with local hazardous materials regulations.

With any spill it is important to determine the scope of spill and follow the appropriate procedure outlined below. Non Hazardous spills can be categorized as small spills, medium spills and large spills.

- Small spills**:** These are spills that can be wiped up with a shop rag. Wet rags will not be put in the dumpster with the shop trash. They will be stored in a covered bin like the kind used at auto service stations. Used rags will be sent to a professional cleaning service or disposed of with the hazardous wastes if necessary.

- Medium-sized spills**:** These are spills too large to wipe up with a rag. Medium sized spills will be contained and soaked up using dry absorbent material such as: Vermiculite, specially-prepared sawdust, or kitty litter. Absorbent snakes may be used as temporary brooms to contain and soak up the liquid. Used absorbent material will be swept up or collected and will be disposed of with the shop trash if non-hazardous or with the hazardous wastes if necessary. A wet/dry shop vacuum cleaner may also be used to collect spills and dispose of the liquid with hazardous wastes. Vacuums will not be used for gasoline, solvents, or other volatile fluids, because the enclosed vacuum may become an explosive hazard.

- Large spills**:** Spills of non-hazardous liquids will be contained and cleaned using a minimum amount of wash water. Storm drain inlets or sewer inlets will be plugged to prevent the spill from entering the MS4. Temporary plugs will be kept onsite for the facility inlets and employees will be trained in when and how to use them.

- Where a leak, spill, or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, 40 CFR Part 302, occurs during a 24-hour period, you shall notify the Ohio EPA Division of Emergency and Remedial Response at (800)282-9378 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as you have knowledge of the discharge. Contact information shall be in locations that are readily accessible and available.

A Spill/Release Incident Reporting form should be filled out promptly after a spill or release, and kept for OEPA auditing.

It is important that every employee is aware of the spill prevention, control and cleanup procedures. Training sessions for the employees along with mock spill response sessions should be conducted on an annual basis to prepare employees for real spills. There shall be spill response kits in all buildings and outdoors near fueling or loading stations. The spill response kit should contain:

- Absorbents
- Broom/dust pan
- Shovel
- Berms/socks
- Paper or cloth towels
- Safety goggles and gloves
- Phone numbers for appropriate cleanup authorities

The spill kits must be replenished soon after usage and checked at regular intervals. There will also be "Spill Response Procedures" posters posted around the facility.

3.5 Erosion and Sediment Controls

The erosion and sediment controls are implemented stabilization measures. The site is fairly flat, so there are no steep slopes. All roads/drives, material storage and staging areas and parking lots are concrete or grindings to control erosion and potential offsite discharges of sediment. Vegetated berms have been built behind the outdoor storage area. The temporary topsoil pile has had vegetation planted to stabilize it. All disturbed areas are seeded and mulched per MS4 criteria. A vegetated swale is also present and treats some of the site discharge.

3.6 Management of Runoff

The site is designed to help manage runoff by collecting the runoff in catch basins with sumps. Minimum amounts of impervious surfaces have been constructed, which helps control the increase of discharge from the site.

Natural vegetation has been left where ever possible.

3.7 Salt Storage Piles or Piles Containing Salt

The salt stockpile is in a covered salt storage shed to prevent the discharge of storm water from the stockpile.

Figure 5 – Salt Storage Shed

3.8 MSGP Sector-Specific Non-Numeric Effluent Limits

N/A – This site (sector P) has no non-numeric effluent limits

3.9 Employee Training

Successful storm water pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations at the Sheffield

Township Maintenance Facility. Training can be completed separately or done in conjunction with regular employee training procedures. The training is ongoing, rather than a onetime event.

Employee training will emphasize the importance of keeping pollutants out of the storm drains, because the drains go directly to the surface waters of the state without benefit of wastewater treatment that the sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain so that they understand the importance of preventing storm water pollution.

The following training will be implemented:

- Experienced workers or other trained personnel will be used to train facility employees.
- Develop a training program including creating educational material that is updated as new rules/regulations are made.
- Training will be completed and documented once per year for all appropriate personnel.
- New personnel will be required to review and understand this document prior to initiating work activities.
- Retraining will be completed, if violations continue to occur.
- Information material shall be displayed to remind workers of BMPs practices.
- Contractors working for the municipality at the facility shall be required to complete Pollution Protection training.

3.10 Non-Stormwater Discharges

The MS4 Permit prohibits discharges of anything but storm water to the MS4. Field Inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge to enter the storm drain are prohibited, including storm drain connections from indoor drains or sinks. These are known as illicit connections and must be eliminated.

Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm drains, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures to help prevent non-storm water discharges will be implemented:

1. Provide well marked proper disposal or collection methods for solid or liquid waste.

2. Train employees in proper disposal of non-storm water discharges. Employees will be educated to understand that storm drains connect directly to waterways without treatment.

3. Label all storm drain inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm drain system.

4. Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-storm water discharges.

5. Periodically inspect and maintain storm drain inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm systems.

6. Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.

7. Check for possible pollutants at the storm water outfall locations and identify the pollutant to correct the situation.

3.11 Waste, Garbage and Floatable Debris

Solid waste dumpster and garbage receptacles have been placed around the site and in the sheds and building for the collection of garbage. The lids must be kept closed on the outside receptacles. Employees are encouraged to keep the areas they are working in, clean and waste/garbage free. Debris on the site will be picked up along with catch basin and storm sewer systems cleaned out on a regular bases.

The collected waste, garbage and debris will be removed and disposed of at approved locations.

3.12 Dust Generation and Vehicle Tracking of Industrial Materials

The site is in an urban setting. The drives and material storage and staging are covered with materials that control dust generation and also eliminate the need for BMPs to control vehicle tracking of materials.

SECTION 4: SCHEDULES AND PROCEDURES FOR MONITORING

Visual inspections of stormwater discharges are no longer required in the MS4 permit. Routine inspections to evaluate discharges and performance of BMPs will be conducted, detained in section 5.

SECTION 5: INSPECTIONS

For the routine facility inspections and the comprehensive site inspections to be performed at your site, include a description of the following:

- The names of the person(s), or the positions of the person(s), responsible for inspection: The Road Department Superintendent for Sheffield Township.

- The schedules to be used for conducting inspections. Routine Facility Inspections are to be conducted annually unless otherwise specified in Part 8 sector-specific requirements, and comprehensive site inspections are to be conducted annually: Routine facility inspections shall be performed once per calendar year, and comprehensive site inspections shall be performed once yearly.

- Specific areas of the facility to be inspected, including schedules for specific outfalls:
  Routine facility inspections shall include inspection of all areas of the facility where industrial materials or activities are exposed to storm water (i.e. outdoor storage, salt storage shed, vehicles), and of all storm water control measures used on site (i.e. catch basins, grassed swale).

  Comprehensive site inspections shall consist of an inspection of the entire site including all areas reviewed for routine facility inspections, areas where spills and leaks have occurred in the past three years, and a review of monitoring data collected by the quarterly visual assessments. Inspectors shall also examine the following:

  - Industrial materials, residue, or trash that may have or could come into contact with storm water
  - Leaks or spills from industrial equipment, drums, tanks, and other containers
  - Offsite tracking of industrial or waste material, or sediment where vehicles enter or exit the site
  - Tracking or blowing of materials (including waste) from areas of no exposure to exposed areas
  - Storm water control measures needing replacement, maintenance, or repair

  Storm water controls measures shall be observed to ensure they are functioning correctly. If discharge locations are inaccessible, nearby downstream locations shall be inspected.

SECTION 6: SWPPP CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Name: Timothy S Mikalauk Title: TRUSTEE

Signature: Timothy S Mikalauk Date: 3-1-22

SECTION 7: SWPPP MODIFICATIONS

REVISION LOG FOR SWPPP MODIFICATIONS

Date of Revision	Section	Description
7/27/2021		updated the NPDES industrial permit number
7/27/2021	1.1	added MS4 permitee and LCSD permit number.
7/27/2021	1.1	Subsector code table updated for composting due to a permit change.
11/8/2021	5.0	Routine Inspections changed to annually, visual inspection removed.
11/8/2021	4.0	Visual inspection requirement removed.

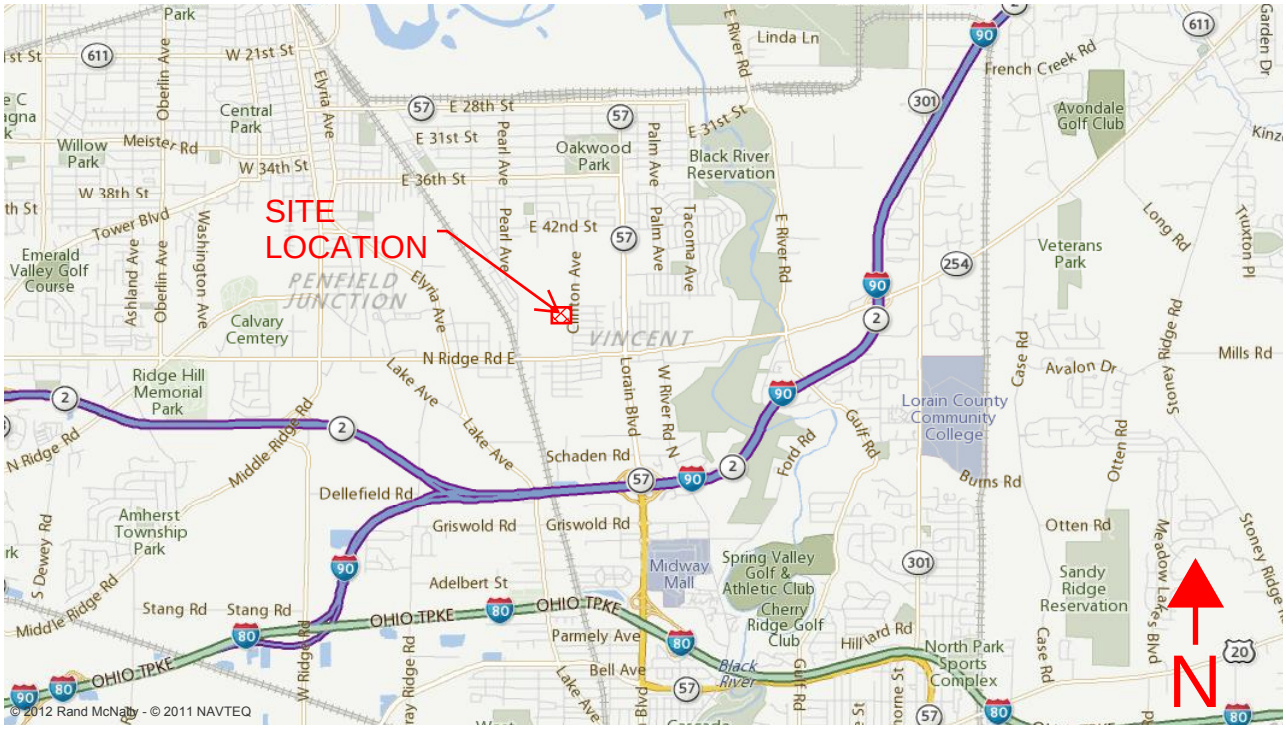
SWPPP ATTACHMENTS

Attachment A – General Location Map

Attachment B – Site Map

Attachment C – Ohio EPA NPDES Permit #OHR000006

Attachment D – Inspection Forms (Routine Facility Inspection / Comprehensive Site Inspection / Miscellaneous Forms)



SHEFFIELD TOWNSHIP
MAINTENANCE FACILITY

ATTACHMENT "A" GENERAL LOCATION MAP

656
658
6" (UNKNOWN SOURCE)
CATCH BASIN #1
DUMPSTER LOCATION
12"
MAINTENANCE AND STORAGE BUILDING
CATCH BASIN #8
CATCH BASIN #2
FIRE STATION
12"
12"
CATCH BASIN #3
CATCH BASIN #9
TEMPORARY STOCKPILES
COUNTY OWNED STORM SEWER
12"
12"
CLINTON AVE.
CATCH BASIN #4
12"
12"
12"
12"
CATCH BASIN #10
CATCH BASIN #11
CATCH BASIN #12
TEST HERE
COUNTY OWNED CATCH BASIN
658
VEGETATED BERM
12"
CATCH BASIN #7
TEST LOCATION
GRINDINGS STOCKPILE
12"
COUNTY OWNED STORM SEWER
TESTING NOTE:
QUARTERLY VISUAL ASSESSMENTS ARE TO TAKE PLACE AT CATCH BASIN #7 AND CATCH BASIN #12. THE WATER LEAVING THE BASINS SHALL BE SAMPLED.
658
OUTDOOR STORAGE
COVERED SALT STORAGE SHED
12"
12"
CATCH BASIN #5
CATCH BASIN #6
GRASSED SWALE

K.E. McCARTNEY & ASSOCIATES
ENGINEERS • PLANNERS • SURVEYORS

0 10 20 40
HORIZONTAL SCALE IN FEET

SITE PLAN - SHEFFIELD TWP. MAINTENANCE GARAGE
5166 CLINTON AVE, LORAIN, OH 44050

ATTACHMENT B

1
1

DRAFTED BY: K.E. McCARTNEY & ASSOCIATES INC. JOB TITLE: SM-125 SHEET NAME: ATTACHMENT B SCALE: 1" = 20' DATE: 5/13/16

The NPDES permit #OHR000006 can be found at the following website:

http://epa.ohio.gov/dsw/permits/GP_IndustrialStormWater.aspx#153894567-final-permit

For a hard copy of the NPDES permit, please contact the "SWPPP Contact" listed on page 3, Section 1.2, of this SWPPP

NPDES Permit Tracking No.:
N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Sheffield Twp Maint. Facility

2. NPDES Permit Tracking No.: N/A

3. Facility Physical Address:

a. Street: 51666 Clinton Ave

b. City: Lorain c. State: OH d. Zip Code: 44050-

4. Lead Inspectors Name: Title:

Additional Inspectors Name(s):

5. Contact Person: Title:

Phone: - - Ext. E-mail:

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
N/A

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:

N/A

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

N	/	A							

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
N/A

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ___ of ___ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: __/__/____

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: __/__/____

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
N/A

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Title:

Signature: Date Signed:

Significant spills, leaks or other releases

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Date of incident:
Location of incident:
Description of incident:
Circumstances leading to release:
Actions taken in response to release:
Measures taken to prevent recurrence:

Employee Training Log

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Training Date:	
Training Description:	
Trainer:	
Employee(s) trained	**Employee signature**

Maintenance Form

Control Measure Maintenance Records (copy information below for each control measure)

Control Measure:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Control Measure Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Industrial Equipment and Systems Maintenance Records (copy information below for each industrial equipment/system)

Industrial Equipment/Systems:
Regular Maintenance Activities:
Regular Maintenance Schedule:

Date of Action:
Reason for Action: ☐ **Regular Maintenance** ☐ **Discovery of Problem**
If Problem,
- **Description of Action Required:**
- **Date Industrial Equipment Returned to Full Function:**
- **Justification for Extended Schedule, if applicable:**

Notes:

Deviations from assessment or monitoring schedule

Date:
☐ **Visual assessments** ☐ **Monitoring**
Describe deviation from schedule:
Reason for deviation:

Date:
☐ **Visual assessments** ☐ **Monitoring**
Describe deviation from schedule:
Reason for deviation:

Date:
☐ **Visual assessments** ☐ **Monitoring**
Describe deviation from schedule:
Reason for deviation:

Date:
☐ **Visual assessments** ☐ **Monitoring**
Describe deviation from schedule:
Reason for deviation:

Routine Facility Inspection Report for MS4 Service Department

General Information			
Facility Name and MS4 Operator	Sheffield Township Maintenance Facility		
NPDES Permit No.	OHR00000		
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information
Weather at time of this inspection? ❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds ❑ Other: Temperature:
Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No **If yes, describe:**
Are there any discharges occurring at the time of inspection? ❑Yes ❑No **If yes, describe:**

Structural Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Measures may include, but are not limited to, oil-water or hydrodynamic separators; storm water management ponds; bioretention areas; permeable pavement; cisterns; sand or other media filters; berms or curbs; covers such as tarps, roofs and lids; secondary containment structures; erosion and sediment controls, catch basin screens, sumps and inserts, spill kits, etc.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1	Vegetated Swales	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2	Catch Basins #1-4	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3	Catch Basins #5-7	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4	12" Outlet from Catch Basin #6	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
5	Catch Basins #8-10	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6	Catch Basins #11-12	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7	Vegetated Berm	❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
8		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
9		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
10		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities Exposed to Storm Water

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	**Vehicle maintenance areas (mechanical repairs, body work, oil changes, etc.)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	**Vehicle washing area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	**Equipment cleaning (includes lawn mowers)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	**Outdoor vehicle and equipment storage/parking areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	**Fueling stations**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	**Salt and salt-containing material storage, loading and mixing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	**Snow disposal yard**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	**Storage yard for scrap, spare or unused materials and equipment**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
9	**Sand, dirt, ditch cleanings, mulch and aggregate storage piles**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	**Catch basin cleanings and street sweepings dewatering and solids management areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	**Yard waste storage and processing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	**Leaf collection area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
13	**Composting area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
14	**Pesticide, herbicide & fertilizer storage and application areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
15	**Hazardous waste collection area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
16	**Used oil storage drums and tanks**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
17	**Waste dumpsters**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
18	**Recycling area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
19	**Impound lot**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
20	**Dust generation and off-site vehicle tracking**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
21	**Indicators of illicit discharge**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Exhibit 8 – Operation and Maintenance Plan

Municipal Facilities/Operations Pollution Prevention/Good Housekeeping Program

Operation and Maintenance Plan

For

Lorain County Storm Water District (SWD)

Prepared by:

Lorain County Engineer
247 Hadaway Street
Elyria, Ohio 44035
440.329.5586

Updated by:

K.E. McCartney & Associates, Inc.
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Elyria, Oh
440.323.9608

December 2021

Summit County, Ohio Municipal Facilities/Operations Pollution Prevention/Good Housekeeping Program
and
NOACA Model Pollution Prevention/Good Housekeeping for Municipal Operations
were used as the basis for preparation of this document

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LIST OF ACROYNMS/ABBREVIATIONS

BMP	Best Management Practice
IDDE	Illicit Discharge Detection and Elimination
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
OEPA	Ohio Environmental Protection Agency
ORC	Ohio Revised Code
O&M	Operation and Maintenance
PPGHP	Pollution Prevention and Good Housekeeping Program
SWD	Lorain County Storm Water District
SWMP	Storm Water Management Program
SWP3	Storm Water Pollution Prevention Plan

1. INTRODUCTION

On December 27, 2002 Ohio EPA issued an NPDES General Permit (Permit No.: OHQ000001) to authorize small Municipal Separate Storm Sewer Systems (MS4s) to discharge storm water under the National Pollutant Discharge Elimination System (NPDES). The OEPA has issued three renewals to the permit (2009, 2014, 2021), with the latest being OHQ00004 (2021). Each renewal of the permit has added additional requirements. As part of these permits, Pollution Prevention/Good Housekeeping is required as one of the six minimum control measures (MCM) under which an Operation and Maintenance (O&M) Plan is also required. This plan outlines the O&M Program that has been developed by the Lorain County Storm Water District (SWD) to meet the requirements of the NPDES General MS4 Permit which will be subsequently referred to as the MS4 permit.

While the SWD is comprised of all of the unincorporated areas of Lorain County, this O&M program is mainly developed for the MS4 permit regulated areas. Under the MS4 permit the County and seven of the Townships are considered small MS4s and are regulated. The regulated areas are further scaled down to those areas considered urbanized by the United States Census. For purposes of this program the urbanized areas will be referred to as the MS4 Permit area. Lorain County is the permit holder for the SWD with the eight regulated Townships and two Municipalities each being co-permittees. The Townships listed as co-permittees of the County are:

- Amherst Township
- Carlisle Township
- Columbia Township
- Eaton Township
- Elyria Township
- Grafton Township
- Henrietta Township
- City of Oberlin
- Village of South Amherst
- Sheffield Township

2. MUNICIPAL FACILITIES WITHIN REGULATED AREAS

The following County, Township and Municipality facilities and operations are located within the regulated area and a Storm Water Pollution Prevention Plan (SWP3) will be developed for each facility.

- Lorain County
  - Maintenance Facility (Maintenance, Salt Storage, Impound Lot)

  42100 Russia Road
  Elyria, Ohio 44035

- Elyria Township
  - Maintenance Facility (Maintenance, Salt Storage, Composting)

  41416 Griswold Rd
  Elyria, Oh 44050

- Sheffield Township

- Maintenance Facility (Maintenance, Salt Storage)

5166 Clinton Ave.
Lorain, Oh 44050

- City of Oberlin
  - Oberlin Municipal Light & Power System Project

289 South Professor Street
Oberlin, OH 44074

The City of Oberlin also plans to implement the O&M program at the following municipal facilities that are not located within an urbanized area:

1. Oberlin Westwood Cemetery
   429 Morgan Street
   Oberlin, OH 44074
2. Oberlin Compost Facility
   E. Lorain Street
   Oberlin, OH 44074
3. Oberlin Service Complex
   583 Hillcreek Drive
   Oberlin, OH 44074

- Village of South Amherst
  - Fire Station (Maintenance)

103 W. Main Street
South Amherst, OH 44001

  - Maintenance Garage (Maintenance, Washing, Stockpiling)

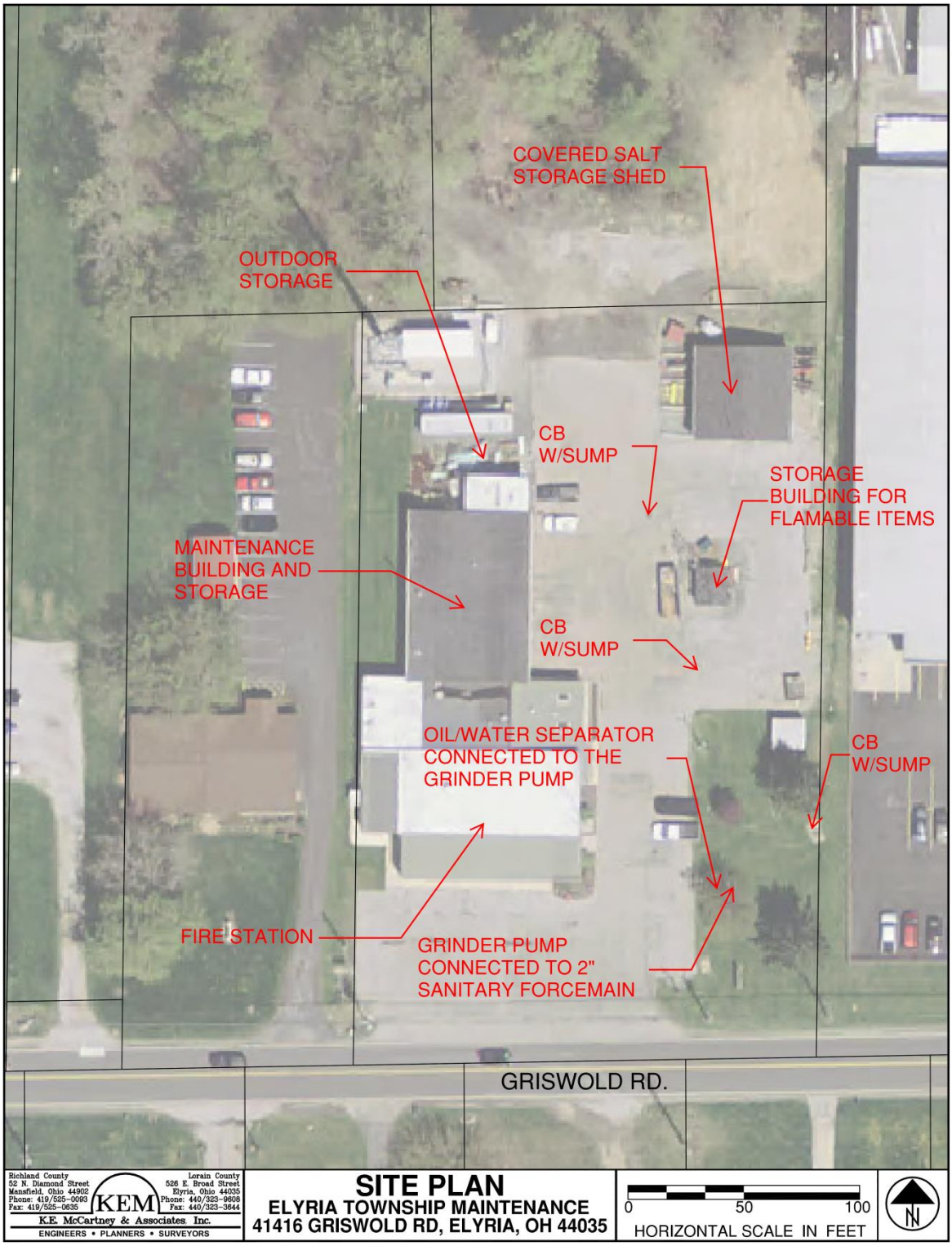
517 W. Main Street
South Amherst, OH 44001

2.1. SITE MAP/LAYOUT OF MUNICIPAL FACILITIES

2.1.1. Lorain County Maintenance Facility

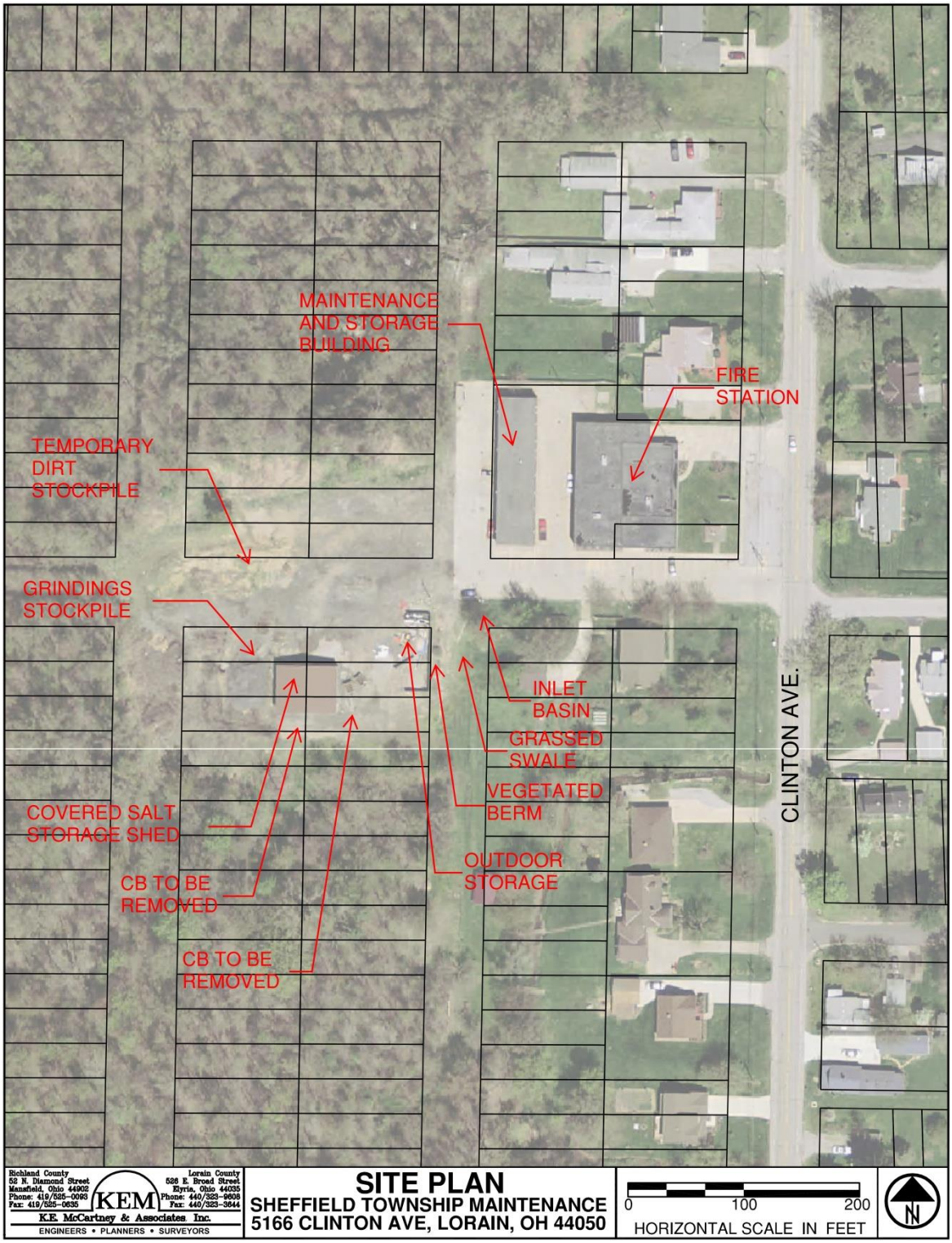
A full scale version of this site plan can be found attached to the facility SWP3.

2.1.2. Elyria Township Maintenance Facility



A full scale version of this site plan can be found attached to the facility SWP3.

2.1.3. Sheffield Township Maintenance Facility

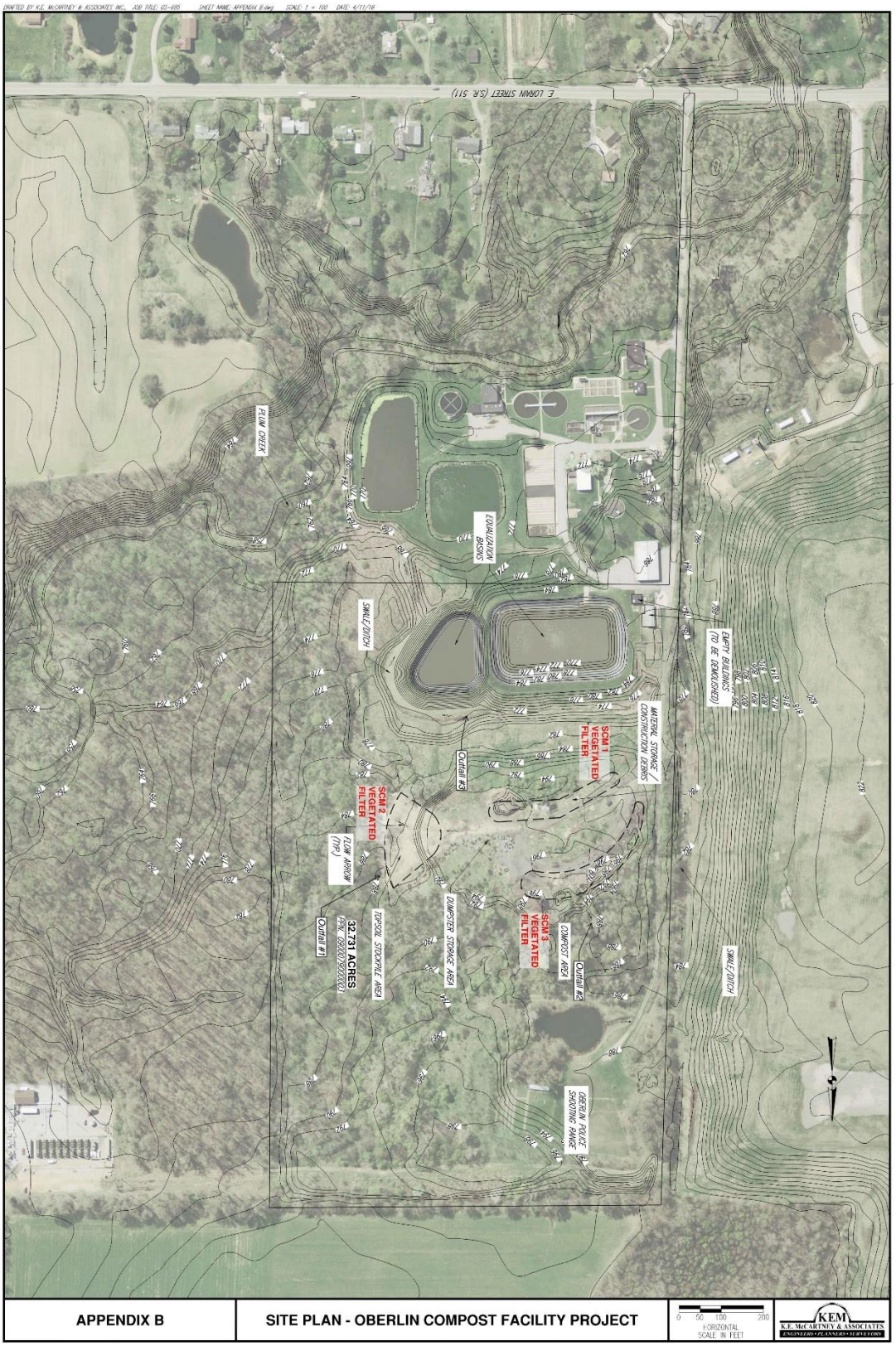


A full scale version of this site plan can be found attached to the facility SWP3.

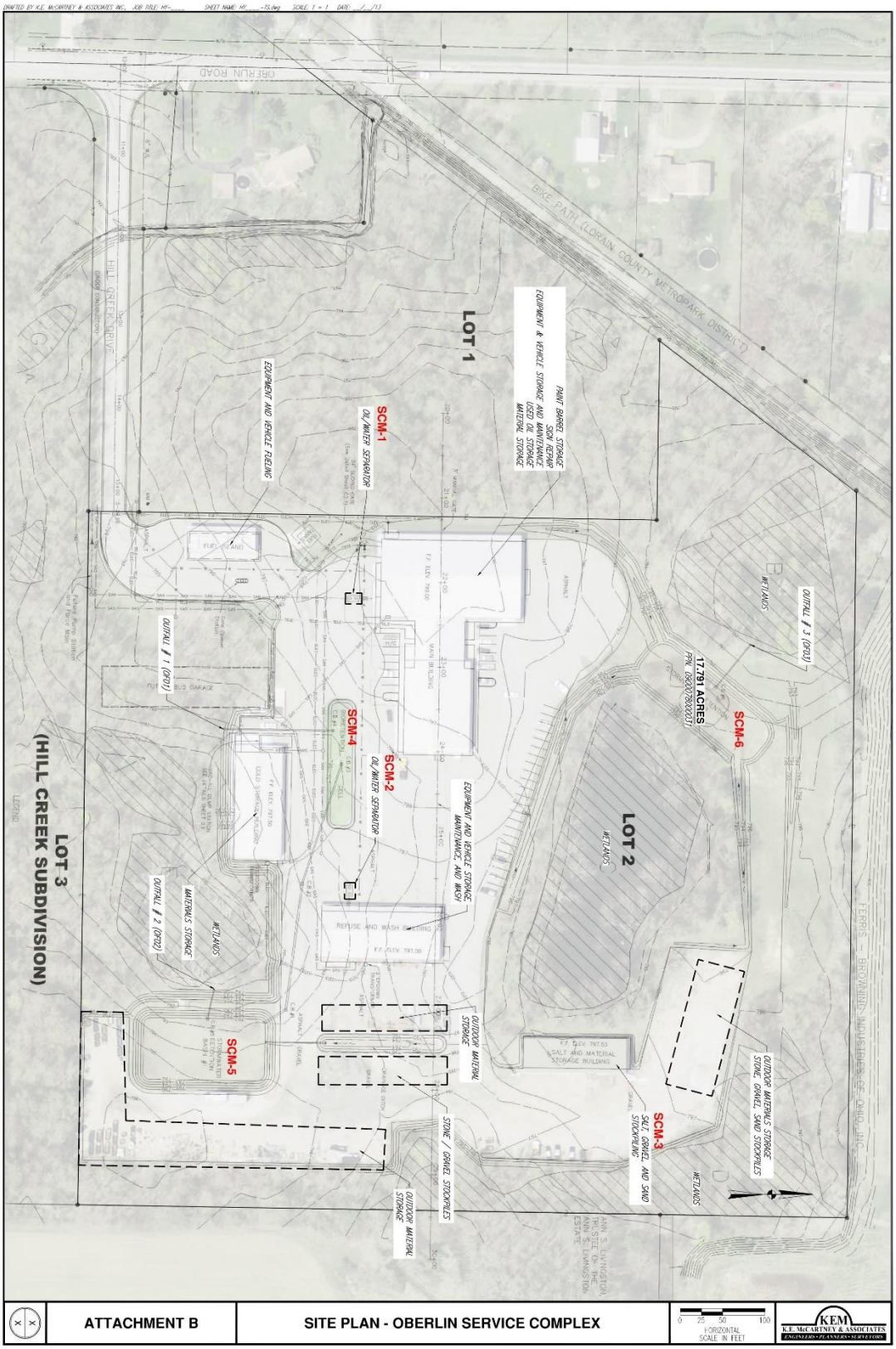
2.1.4. Oberlin Municipal Light & Power Service Department

2.1.5. Oberlin Westwood Cemetery

2.1.6. Oberlin Compost Facility

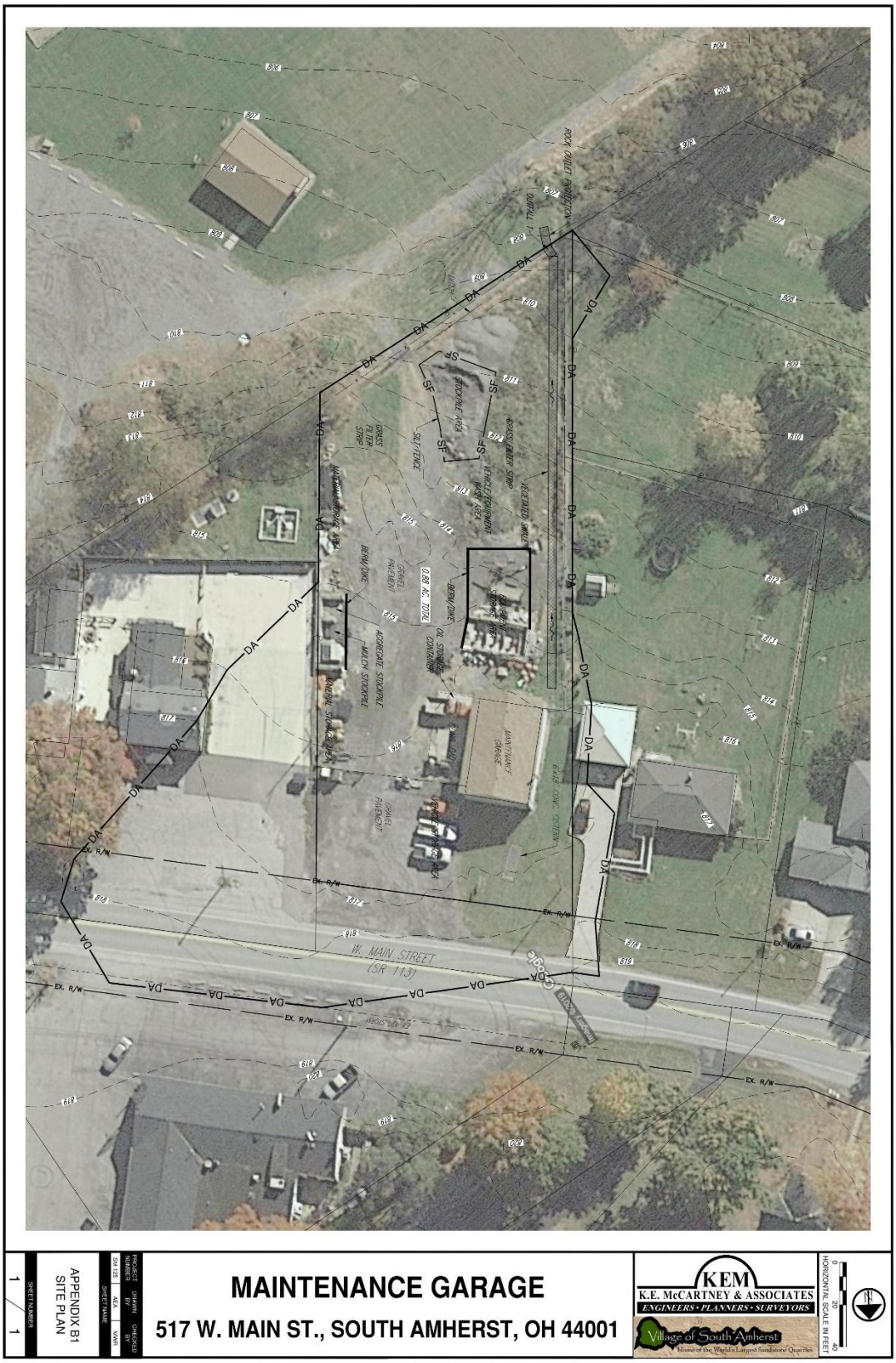


2.1.7. Oberlin Service Complex



2.1.8. The Village of South Amherst Fire Department

2.1.9. The Village of South Amherst Maintenance Garage



2.1.10. The Village of South Amherst Cemetery

3. DESCRIPTION OF PROPOSED BMPS

The following sections briefly describe each of the BMPs proposed as part of the LCSWD O & M Plan.

3.1. POLLUTION PREVENTION TRAINING FOR EMPLOYEES

Successful storm water pollution control relies in large part on proper training and education of employees. Many of the recommended BMPs (Best Management Practices) will require specific training for employees who conduct the activities. It is essential that employees understand and implement the BMPs that apply to operations within their facility. Training can be completed separately or done in conjunction with regular employee training procedures. Training should be ongoing, rather than a onetime event and conducted at least annually.

Employee training will be performed in conjunction with the outreach programs developed for MCM #1 Public Education and Outreach, MCM #2 public information minimum measure and MCM#3 Illicit Discharge minimization measure. The training should emphasize the importance of keeping pollutants out of the MS4 (Municipal Separate Storm Sewer System), Storm Drains and other watercourses. Storm Drains many times go directly to the surface waters of the state without the benefit of wastewater treatment that sanitary sewers receive. Facility personnel will be educated about the harmful environmental effects of improper disposal of materials into the storm drain system so that they understand the importance of preventing storm water pollution.

The following training will be implemented:

4. Experienced workers or other trained personnel will be used to train inexperienced facility employees.

5. Employees will be given opportunities every year to attend training sessions in line with the O&M program.

6. Training will be completed and documented once per year for all appropriate personnel.

7. New personnel will be required to review and understand this document prior to initiating work activities.

8. Retraining will be completed if violations continue to occur.

9. Information material shall be displayed to remind workers of best management practices.

10. Contractors working for the municipality at the facility shall be required to complete Pollution Prevention training.

Training is required for the County, the eight MS4 Townships, the Municipalities and each entity is responsible to ensure their employees are being trained appropriately.

10.1. ELIMINATING ILLICIT AND NON-STORM WATER DISCHARGES

The MS4 Permit prohibits discharges of anything but storm water to the MS4. Field Inspectors will play a key role in identifying unauthorized discharges. Connections that allow any illicit discharge

to enter the storm drain are prohibited, including storm drain connections from indoor drains or sinks. These are known as illicit connections and must be eliminated.

Another form of prohibited discharge is illegal dumping. Pollutants may be introduced to storm drains inadvertently, by routine practices that discharge water outdoors, or they may be released intentionally by routinely discharging wastes, wash water, and other materials to storm drains, catch basins, and other conveyance facilities either on the facility or in the street. A large part of this improper discharge results from employee lack of understanding, coupled with a lack of readily available proper routes for the discharge.

The following measures to help prevent non-storm water discharges will be implemented:

- Provide well marked proper disposal or collection methods for solid or liquid waste.
- Train employees in proper disposal of non-storm water discharges. Employees will be educated to understand that storm drains connect directly to waterways without treatment.
- Label all storm drain inlets and catch basins “No dumping—flows to streams” so employees can tell which inlets are part of the storm drain system.
- Periodically inspect and maintain the facility operations and BMPs to evaluate the success of efforts to reduce and eliminate non-storm water discharges.
- Periodically inspect and maintain storm drain inlets. Clean out catch basins so that accumulated pollutants do not wash down the storm systems.
- Involve the public in clean-up or watching for illegal dumping by offering residents a hotline, website or e-mail address.
- Check for possible pollutants at the storm water outfall locations and identify the pollutant to correct the situation.

10.2. SPILL PREVENTION, CONTROL, AND CLEANUP

Even small spills can have cumulative effects that add up to a significant source of pollutants in storm water discharges. The goal of the SWD is to prevent spills and leaks, maintain a regular inspection and repair schedule, and correct potential spill situations before a spill can occur. Proper recording keeping is required for OEPA auditing.

The following prevention measures should be implemented:

- Maintain sufficient aisle space in storage areas
- Stack items at safe heights so as to be easily accessed
- When working with liquids outdoors, cover all storm drains with mats or berms **prior** to beginning work

- Do not overload pallets, shelves or transportation equipment
- Monitor storage units for leaks, cracks, rust, or other signs of structural degradation
- Make sure items are stored away from areas where the chance of an accident to occur is greater
- Refill materials in secondary containments or indoors
- Look to install leak detection devices, overflow controls and diversion berms
- Recycle, reclaim or reuse material is possible
- Replace toxic materials with less or non toxic products

10.2.1. Spill Response:

When a spill does occur, quick and effective response will prevent pollutants from reaching any surface water. Spills must be cleaned up promptly so that pollutants do not remain on the pavement to be washed to the storm drains with the next rain or remain in the soil to become a possible groundwater pollutant. If the spill is on an unpaved surface, determine whether the contaminated soil should be removed to prevent it from being a source of future storm water pollutants. Spill procedures will also include cleaning up leaks, drips, and other spills without water whenever possible.

Spill prevention and response procedures for hazardous materials stored or handled onsite will follow the procedures described in the facility Hazardous Materials Management Plan. Responsible personnel will contain and collect the spilled substance, then dispose of the substances and any contaminated soil in compliance with local hazardous materials regulations.

With any spill it is important to determine the scope of spill and follow the appropriate procedure outlined below. Non Hazardous spills can be categorized as small spills, medium spills and large spills.

1. **Small spills:** These are spills that can be wiped up with a shop rag. Wet rags will not be put in the dumpster with the shop trash – they will be stored in a covered bin like the kind used at auto service stations. Used rags will be sent to a professional cleaning service or disposed of with the hazardous wastes if necessary.

2. **Medium-sized spills:** These are spills too large to wipe up with a rag. Medium sized spills will be contained and soaked up using dry absorbent material such as: Vermiculite, specially-prepared sawdust, or kitty litter. Absorbent snakes may be used as temporary brooms to contain and soak up the liquid. Used absorbent material will be swept up or collected and will be disposed of with the shop trash if non-hazardous or with the hazardous wastes if necessary. A wet/dry shop vacuum cleaner may also be used to collect spills and dispose of the liquid with hazardous wastes. Vacuums will not be used for gasoline, solvents, or other volatile fluids, because the enclosed vacuum may become an explosive hazard.

3. **Large spills:** Spills of non-hazardous liquids will be contained and cleaned using a minimum amount of wash water. Storm drain inlets or sewer inlets will be plugged to prevent the spill from entering the MS4 or watercourse. Temporary plugs will be kept onsite for the facility inlets and employees will be trained on when and how to use them. For hazardous materials spills, the procedures described in the Hazardous Materials Management Plan will be implemented.

A Spill/Release Incident Reporting form is provided in Appendix A. This form should be filled out promptly after a spill or release and kept for OEPA auditing.

10.2.2. Spill Training:

It is important that every employee is aware of the spill prevention, control and cleanup procedures. Training sessions for the employees along with mock spill response sessions should be conducted on an annual basis to prepare employees for real spills. Every municipal facility should have spill response kits in all buildings on their facility and outdoors near fueling or loading stations. A spill response kit should contain at a minimum:

1. Absorbents
2. Broom/dust pan
3. Shovel
4. Berms/socks
5. Paper or cloth towels
6. Safety goggles and gloves
7. Phone numbers for appropriate cleanup authorities and emergency responders

Spill kits must be replenished immediately after usage and checked at regular intervals.

10.2.3. Spill Prevention, Control and Cleanup Goals:

1. Hold one training session every year at each municipal facility
2. Hold one mock spill response training once a year at each municipal facility
3. Hang “Spill Response Procedures” posters at all municipal facilities

It is the responsibility of each facility owner to ensure the above goals are met.

10.3. LANDSCAPING CHEMICAL USAGE

A good operation and maintenance program includes maintenance of roadside landscaping, regularly scheduled mowing, weed management and controlling pests within the right of way. Landscape maintenance procedures like spraying herbicides, fertilizers, and pesticides to get rid of unwanted pests and invasive species can contribute pollutants that negatively impact the receiving waters.

The following BMPs for pesticide, herbicide and fertilizer management should be implemented:

1. Train all employees engaged in landscaping activities in the proper handling of landscaping chemicals
2. All new employees should undergo training before they are allowed to apply any landscaping chemicals
3. Where practicable, use mechanical methods of vegetation removal rather than herbicides
4. Use pesticides along roadsides only if there is an actual pest problem and not as a regularly scheduled preventive maintenance measure (Lorain County currently sprays all County roadsides every 2-3 years and guardrails every year)
5. Use the least toxic product for the job. If available and feasible, replace chemical herbicides and pesticides with organic alternatives
6. Schedule applications relative to wind conditions
7. Do not spray herbicides and pesticides within one day of a rain event, during rain or when water is flowing off-site
8. Do not mix or prepare herbicides and pesticides near storm drain outlets
9. Follow product labels for proper application of any pesticide or herbicide
10. Follow federal, state and local laws governing the storage and disposal of pesticides and herbicides
11. Rinse water from equipment cleaning and/or from herbicide/pesticide/fertilizer containers should be used as product, recycled into product, or disposed of properly

10.3.1. Record-keeping, Compliance and Reporting:

1. Maintain detailed application records about chemical usage including type of chemical used, application rate and method at the chemical storage facility. Prepare an annual report of this data
2. Keep inventory records current for all herbicides, fertilizers and pesticides
3. Label all landscaping chemicals clearly

4. Maintain records for all employees training

5. Update training material regularly to reflect changes in federal, state and local regulations

10.4. OPEN SPACE MANAGEMENT

Currently there are no parks or open spaces maintained within the urbanized areas on a regular basis. However, the design and layout of open spaces can help in the management of stormwater by providing green infrastructure, which allows absorption of rainwater, a reduction in the rate of discharge into the surface waters, storage and filtration, which help to remove pollutants and reduction of sedimentation. Regular maintenance of these areas is required, including mowing, pruning, pick-up of vegetated waste, mulching, trash pick-up, and trail and parking lot maintenance.

The BMPs and maintenance required for open space management include:

1. Creation of undeveloped preserve areas using the natural vegetation while protecting natural features, especially around surface waters

2. Design of the open space areas so that stormwater runoff is controlled and treated where possible with the use of water quality BMPs

3. Design using native vegetation to reduce the need for irrigation, fertilizer and pesticides

4. Regularly scheduled mowing of grassy areas and proper disposal of the clippings

5. Tree pruning and removal/proper disposal of fallen limbs and other vegetative waste

6. Proper mulching to control weeds

7. Trash pick-up and proper disposal of waste

8. Trail and parking lot maintenance

9. Design of landscaping to use green BMPs to remove pollutants and reduce sedimentation

10.4.1. Record-keeping, Compliance and Reporting:

1. Records should be kept of maintenance activities to be documented in the annual report

2. Any new developed or improved open spaces using green BMPs should be included in the annual report

10.5. DITCH/MS4 MAINTENANCE

For areas of soil disturbance associated with ditch/MS4 maintenance caused by the small MS4, soil stabilization shall, at a minimum, be initiated in accordance with the time frames specified in the following: For areas not within 50 feet of a surface water of the State stabilization should be within 7 days of reaching final grade or within the first 7 days if a disturbed area will remain inactive for over 14 days. For areas within 50 feet of a surface water of the State stabilization

should be within 2 days of reaching final grade or within 2 days if the area is to remain inactive for over 14 days.

10.5.1. Record-keeping, Compliance and Reporting:

- Records should be kept of maintenance activities and stabilization measures to be documented in the annual report.

10.6. LEAF RECYCLING PROGRAMS

The runoff from yard waste and leaf recycling storage areas should be managed so as not to enter local waterways either directly or through the MS4. The maintenance facility in Elyria Township has a leaf and yard waste recycling & composting facility.

The following BMPs for the leaf recycling program should be implemented:

1. Runoff from the uncovered storage area should be directed to vegetated areas where it can be naturally filtered
2. If the runoff cannot be directed to a vegetated area for filtration, then runoff from uncovered storage area should be captured into a water quality system designed to remove total suspended solids and nutrients.
3. Check the site after every major rain event to make sure the site continues to drain properly
4. Provide regular inspection of the recycling program to ensure its proper management
5. Make sure to meet local, state and federal regulations for removal, storage, and recycling

10.6.1. Record-keeping, Compliance and Reporting:

1. Maintain a file containing records of site inspection after every major rain event
2. Prepare an annual report of this data

10.7. FLEET MAINTENANCE

Maintaining the vehicle fleets used for various municipal operations is important but also has the potential for spills or leaks of fluids, fuels or other polluting liquids. Vehicle washing can also contribute soap, debris, and pollutants into the MS4 and local waterways. The SWD's goal will be to reduce pollutants from these activities. To meet this goal, BMPs were identified in the following areas.

1. Vehicle Maintenance
2. Vehicle Storage Areas
3. Vehicle Fueling
4. Vehicle Washing
5. Record Keeping

10.7.1. Vehicle Maintenance

Vehicle maintenance may include vehicle fluid removal, engine and parts cleaning and repair. Outdoor vehicle maintenance has the potential for pollutants to be discharged into the MS4 and local waterways. For this reason vehicle maintenance should only be undertaken in an area designated for vehicle maintenance.

The following BMPs for vehicle and equipment maintenance should be implemented:

1. Equipment will be kept clean so that a buildup of grease and oil will not wash away when the equipment is exposed to rain
2. Whenever possible, vehicle and equipment maintenance will be performed in an indoor garage
3. Outdoor vehicle maintenance shall not be done during rain or predicted rain events unless it is an emergency
4. Vehicles are to be regularly inspected for leaks
5. Vehicle and equipment maintenance areas should be paved with concrete or asphalt
6. Maintenance areas are to be kept clean, well organized and equipped with cleanup supplies and spill kits
7. Drip pans or containers are to be kept under the vehicles at all times during maintenance
8. Fluids are to be drained from any retired vehicles kept on-site for scrap or parts. Stored or out-of service vehicles awaiting restoration or service, and vehicles being held for resale are to be checked periodically for leakage. Drip pans or containers are to be kept under the vehicles
9. A berm or other runoff controls will be installed to prevent run-on and run-off from areas where vehicle maintenance occurs
10. Drainage from maintenance sites will be directed to a connection to the sanitary sewer system or to a system that passes thru an oil/water separator. The Facility operator shall contact the wastewater system operator to determine pretreatment requirements

10.7.2. Vehicle Storage Areas

Vehicles parked outside without cover have the potential to drip or leak fluids that can be carried to the stormwater system. All three Municipal facilities within the SWD have vehicle & equipment storage areas.

The following BMPs for vehicle storage areas should be implemented:

1. Vehicles and equipment will be inspected to identify sources of spills or leaks
2. Designated facility personnel will perform regular walk-by inspections
3. The equipment yard will be kept clean and clear of debris and litter
4. Storm drain inlets will be cleaned on a regular schedule and also after large storms. Special attention will be paid to the kinds of potential pollutants that accumulate there as a result of facility activities so that appropriate measures can be taken to control any pollutant sources

5. Improvements to vehicle or equipment storage areas should include grading the area to slope into a longitudinal drain, or installation of curbs to direct all storm water to a single point of discharge to easily visually monitor the storm water discharge. If the vehicle or equipment yard is a potential source of oily materials, then the inlet will be fitted with an oil/water separator or oil/grease trap

6. Consistent parking spots will be designated for each vehicle so that if a leak is indicated on the ground, the vehicle can be identified and repaired

7. A special area will be constructed for the facility's "dirtiest" equipment (tar equipment, asphalt paving equipment, etc.) in order to handle the discharges, leaks, and runoff separately with more intensive BMP.

8. Spills will be cleaned up promptly; using dry cleanup procedures described in Section 3.3

10.7.3. Vehicle Fueling Areas

Vehicle and equipment fueling areas are designed and operated to minimize the potential for spilled fuel and leaked fluids from coming into contact with storm water. Even very small spills, when they happen every day, add up to a lot of fuel in the MS4 and local waterways. Fueling areas ideally should drain to a sump. However, if the area drains to a valved-off storm drain or sewer connection, it needs to be pumped out and cleaned before the valve may be opened during a rainfall.

The following BMPs for the proper operation of a fueling area should be implemented:

1. A paved area or concrete slab will be used for the fueling area (concrete is preferred because fuel and oils cause asphalt to deteriorate)

2. Gasoline overflows and spills will be cleaned up immediately, using dry methods as described in Section 3.3. Spills will not be allowed to run off or evaporate, and will not be flushed with a hose. Absorbent material will be used and disposed of as described in Section 3.3

3. Signs will be posted that instruct pump operators not to “top off” or overfill gas tanks

4. Dry cleanup materials will be kept in the fueling area, and employees will be instructed in the proper dry cleanup methods described in Section 3.3. Facility personnel will inspect the area every day for gasoline, motor oil, or other fluids that may have leaked

5. Keep temporary fuel tanks in a bermed area that has an impervious lining, such as concrete or a heavy-mil plastic liner

6. Personnel will be present at all times at the fueling pump during the fuel transfer, particularly at unattended or self serve stations

If the vehicle fueling area is one of the significant sources of pollutants from the facility, the following additional design features may need to be considered:

1. Cover the fueling area to prevent rain from falling directly on the area. Install a roof over the fueling island and the area where vehicles park while fueling.

2. Storm drain and sewer inlets that drain the fueling area must be equipped with a shutoff valve to keep fuel out of the drain in the event of a spill from the pumps

3. The valve should be kept closed at all times except during a storm event. Curtail fueling activities when the valve must be open, or use extra precautions to capture any spilled fuel, such as a large drip pan under the vehicle

4. Storm drain and sewer inlets that drain the fueling area may also go to an oil/water separator

The following design features should be incorporated into new fuel area designs:

1. The fueling area will be separated from the rest of the yard, both to contain any fuel spill and to prevent clean storm water from running on and contacting accumulated fuel spills and motor fluid leaks. One of the following designs will be adopted:

   - Grade the fueling area to be “mounded or elevated”.

   - Install berms around the area that are high enough to redirect water from a large storm.

2. Any storm drain inlets that receive runoff from the fueling area will have a sump (to hold any accumulated liquids for pumping); will be connected to sanitary sewer lines (after checking to get all the permits the wastewater authority may require): or will be connected to an oil/water separator

10.7.4. Vehicle Washing

Facilities often wash equipment and vehicles on site. Wash water from vehicle washing has the potential to carry chemicals, detergents and other pollutants into the storm system. For this reason, whenever possible vehicles should be washed at commercial wash facilities.

The following BMPs for vehicle washing should be implemented:

1. Vehicles and equipment are washed only in designated areas

2. Wash areas are paved and clearly marked

3. Sumps or drain lines are installed to collect wash water for treatment and discharge to the sanitary sewer; reuse (for repeated washings); or recycle (used elsewhere onsite)

4. The wash area is graded or bermed to prevent storm water run on

5. Washing takes place on gravel, grass, or other permeable surfaces

6. Use only biodegradable soaps

7. Equipment and vehicle washing takes place inside a building designed for maintenance or equipment storage. All drains from the wash area are connected to the sanitary sewer and no storm water contacts the area

8. A commercial car wash is used to wash the facility vehicles and equipment

9. Minimize water usage

10.7.5. Record-keeping, Compliance and Reporting:

1. Maintain a file containing records of site inspection of maintenance sites.

2. Document any spills using the 'Spill/Release Incident Reporting form' provided in Appendix A.

3. Prepare an annual report of this data.

10.8. OUTDOOR MATERIALS STORAGE AND HANDLING

Outdoor material storage areas will be inspected for possible exposure of pollutants to storm water runoff. Bulk solid materials, raw materials, and construction materials, or supplies stored outdoors will be covered and protected from storm water if pollutants could enter the MS4 or local waterways. Materials of concern include gravel, sand, lumber, topsoil, compost, concrete, metal products, and others.

The following BMPs for outdoor materials storage and handling areas should be implemented:

a. Material is stored in one of three ways:

   - On a paved surface with a roof or covering so that no direct rainfall contacts them, and with appropriate berms or runoff controls to prevent run-on of storm water

   - On a specially constructed paved area with a drainage system and slope to minimize water pooling. Prevent runoff and run-on with berms or curbing along the perimeter. Drainage is directed to treatment facilities or water quality catch basins along the lower edge of the pad

   - Covered with plastic sheeting, secured with weights such as tires or sand bags. If possible, a mounded or bermed area that will prevent run-on of storm water will be used

b. The parking lot or other surfaces near bulk materials storage facilities will be swept periodically to remove fines that may wash out of the materials

c. Liquid tanks will be kept in a designated area on a paved impermeable surface and within a berm or other secondary containment

d. Hazardous materials will be stored as described in the Hazardous Materials Management Plan and in a manner that ensures storm water protection

e. Outdoor storage containers will be kept in good condition. Containers will be inspected regularly for damage or leaks

f. A portable pumping system will be used that can be moved to accommodate separate containment structures on the facility. Water can then be pumped into a truck or portable temporary holding tank. The water then can be tested and disposed of according to whether any pollutants are present

10.8.1. Record-keeping, Compliance and Reporting:

1. Maintain a file containing records of site inspections of outdoor material storage sites
2. Document any spills using the 'Spill/Release Incident Reporting form' provided in Appendix A
3. Prepare an annual report of this data

10.9. ROAD SALT STORAGE

Lorain Count, Township, Municipality maintenance facilities are locations for the storage of road salt. The goal at these facilities is to prevent runoff contaminated by stored salt from reaching the MS4 and local waterways.

The following BMPs for outdoor storage of road salt should be implemented:

□ Road salt storage areas are covered with no run-on and subsequent run-off of salt. Road salt should be preferably stored in covered shelters with a door to prevent blowing by wind and runoff from rain events

□ Salt truck loading areas are swept regularly to minimize salt laden runoff. Drainage from the salt truck loading area is captured by an onsite basin to minimize salt laden discharges from the facility

□ Follow the salt storage guidelines developed by the Ohio Department of Transportation for proper storage of salt

□ All brine or other liquid road treatments shall have secondary containment and/or bollard protection.

10.9.1. Record-keeping, Compliance and Reporting:

a. Maintain an inventory of all storage locations

b. Annually assess the adequacy of the protection at existing storage areas.

c. Prepare an annual report of status of runoff controls at storage location to document the effectiveness of control efforts.

10.10. SNOW REMOVAL AND STREET SALTING

Safe roads in cold climates require the use of snow plows, road salt, and de-icers on sidewalks. Employees of the County and Townships are responsible for these activities. De-icers can contain chlorine that can kill fish if they are washed into waterways. Salt can damage roads, and excessive salting can carry salt into waterways.

The following BMPs for snow removal and street salting should be implemented:

1. Develop a written policy to minimize the amount of road salt required to maintain public safety
2. Provide regular training to all applicators about the usage of road salt and correct usage of equipment
3. Select de-icers that cause the least adverse environmental impact while still providing adequate public safety
4. Store Liquid de-icers in secondary containment until use
5. Salt trucks should not be overfilled and should be covered where possible. All equipment should be operated according to manufacturer's recommendation for optimal performance
6. Whenever possible, avoid covering storm inlets during plowing, allowing snow to melt and drain
7. Snow shall not be disposed of within 25 feet of surface waters, 75 feet of private water supplies, 200 feet from any community water supply, or 400 feet from any municipal well
8. Spills should be cleaned up immediately and completely as listed in section 3.3

10.10.1. Record-keeping, Compliance and Reporting:

1. Document policies in place to reduce usage of road salt and de-icers
2. Keep records of winter de-icing/salting/sanding activities – location, type, frequency. etc.
3. Keep records of employee training and copies of any training material
4. Prepare an annual report of this information

10.11. STREET SWEEPING

Regular street sweeping can clean up debris such as dust, dirt and other solid pollutants that may otherwise end up in the storm conveyance system. It is recommended that sweeping be conducted at least twice a year on all roads.

The following BMPs for street sweeping should be implemented:

1. Develop a street sweeping program for the County and Townships if beneficial to the storm water management effort
2. Maintain sweeping equipment in good working condition
3. Dispose of swept material following the County's Waste Disposal Protocol in Section 3.12
4. Coordinate street sweeping schedules to coincide with important pollution prevention events such as winter sanding operations and peak leaf fall in the autumn
5. Whenever possible, coordinate street sweeping to occur just prior to catch basin cleaning
6. Train operator on factors that influence pollutant removal, including sweeper speed, brush adjustment, rotation rate, sweeping pattern, and maneuvering around parked vehicles
7. Avoid wet cleaning or flushing and utilize dry methods whenever possible
8. If wet cleaning or flushing is absolutely necessary, sweep and remove debris prior to flushing; plug storm drain inlets and direct wash water to sanitary sewer

10.11.1. Record-keeping, Compliance and Reporting:

1. Keep records of the number of miles swept annually and the pounds of material collected
2. Prepare an annual report of this information

10.12. WASTE HANDLING AND DISPOSAL

This section summarizes the preferred storage and disposal practices for some common municipal facility wastes. For many wastes, reusing or recycling is the most cost effective means to prevent pollution.

The waste handling and disposal BMPs for municipal facilities are as follows:

1. General shop trash will be kept in a dumpster with the lid closed. The dumpster is kept on a paved area and kept clean by picking up dropped trash and sweeping the area regularly
2. Liquid wastes are kept out of the dumpster and the lid is kept closed to keep storm water out

3. Scrap metal or other materials kept outdoors are covered by a roof or tarpaulin
4. Scrap parts or other metals are kept in a shed or under a roof out of the rain
5. Waste metal is collected for delivery to a scrap metal dealer
6. Empty drums stored outdoors are sealed to be watertight
7. Hazardous materials or wastes are stored in accordance with the Hazardous Materials Management Plan for the facility and are kept in a covered and locked area
8. Waste oil, antifreeze, spent solvents, and other liquids from vehicle maintenance activities are recycled
9. Spent batteries are disposed of as hazardous waste or returned for reclamation and reuse
10. Street Sweeping and Catch Basin cleaning material should be disposed of at a secure disposal facility

10.13. CATCH BASIN CLEANING

Catch basin cleaning is the responsibility of road maintenance departments. The materials removed from these basins have a significant pollution potential and must be properly handled and disposed of. Catch basins should be cleaned on a regular basis so as to maintain their function, which is to remove solids washed off the street during rainfall or snow melt events. If not maintained, these materials can be discharged to local waterways.

The following BMPs for Catch Basin Cleaning should be implemented:

1. Train road maintenance personnel in proper collection, handling and disposal methods
2. Conduct regular inspections of the existing collection systems to ensure contaminants are not released into the environment

10.13.1. Record Keeping, Compliance and Reporting:

1. Document catch basins cleaned, amount of material collected, and how the material was disposed of
2. Prepare an annual report of this information

10.14. MUNICIPAL PARKING LOT SWEEPING

Parking lots can be a significant source of automotive wastewater wash off, along with dust, dirt and other solid pollutants. The County, Townships and Municipalities should be encouraged to develop a sweeping program to help prevent these pollutants ending up in the storm conveyance system. This program can be part of the street sweeping program.

The BMPs for municipal parking lot sweeping are as follows:

1. Develop a municipal parking lot sweeping program for the County, Townships and Municipalities if beneficial to the storm water management effort.

2. Maintain sweeping equipment in good working condition.

3. Dispose of swept material following the County's Waste Disposal Protocol in Section 3.12

4. Coordinate parking lot sweeping schedules to coincide with important pollution prevention events such as winter salting/sanding operations and peak leaf fall in the autumn.

5. Whenever possible, coordinate parking lot sweeping to occur just prior to catch basin cleaning.

6. Train operator on factors that influence pollutant removal, including sweeper speed, brush adjustment, rotation rate, sweeping pattern, and maneuvering around parked vehicles.

7. Avoid wet cleaning or flushing and utilize dry methods whenever possible.

8. If wet cleaning or flushing is absolutely necessary, sweep and remove debris prior to flushing; plug storm drain inlets and direct wash water to sanitary sewer.

10.14.1. Record-keeping, Compliance and Reporting:

1. If parking lot sweeping is conducted, keep records of the lots and area swept annually and the pounds of material collected

2. Prepare an annual report of this information

10.15. DISPOSAL OF CONSTRUCTION DEBRIS

This BMP relates to the proper disposal of construction demolition debris from County and Township owned projects. The County and Townships should already be properly disposing, recycling or reusing this debris per local, state and federal regulations.

The following BMPs apply:

1. The stored material should be clean.

2. Stockpiled material should be covered if possible by tarp or roof

3. The storm water discharge should not be allowed to drain directly into the MS4 or local waterways

4. The recycled storage stockpiled areas should be graded or bermed so that the storm water runoff does not discharge directly into the MS4 or local waterways

5. The storm water runoff from recycled storage stockpiled areas should be discharged thru a filter strip to remove sedimentation and pollutants

6. Recycling or Reuse of materials is the preferable BMP

10.15.1. Record Keeping, Compliance and Reporting:

1. Documents should be kept on the types and quantities of material generated and the disposal, storage or reuse location of the material for annual reporting

10.16. CONSTRUCTION SITE EROSION/SEDIMENT CONTROL

The SWD has passed resolutions adopting the "Lorain County Erosion & Sediment Control Rules" which require erosion and sediment controls at construction sites. Municipal construction projects are subject to the same requirements as those projects proposed by private developers. During construction, proper erosion and sediment controls should be used to prevent sediment-laden storm water from flowing away from the site and into the storm water collection and conveyance system. Construction sites greater than one acre or part of a larger common plan of development have to document their planned sediment and erosion control techniques and to obtain NPDES Permit coverage.

The following BMPs apply:

1. Develop a Storm Water Pollution Prevention Plan for all construction sites that meet the requirements of the Lorain County Erosion and Sediment Control Rules

2. Minimize land disturbance and exposed slope length

3. Whenever possible, avoid land disturbance during the wet season

4. Implement erosion control techniques or devices to stabilize disturbed areas. Use mulch or other erosion control measures when soils are exposed for more than a week

5. Install storm drain inlet protection on all inlets within 500 feet downstream or down gradient of the project site to prevent coarse sediment from entering the drainage system. Inlet protection methods include block and gravel inlet protection, gravel and wire inlet protection, and catch basin inserts. Inspect inlet protections frequently during construction

6. Remove excess soil from the site as soon as possible after backfilling to eliminate sediment loss from surplus fill

10.16.1. Record Keeping, Compliance and Reporting:

1. Record number of sites with a SWP3 and provide information for annual report

10.17. FACILITY GOOD HOUSEKEEPING ACTIVITIES

The following good housekeeping practices will be implemented on a regular basis:

1. Facility clean-up will be completed without water whenever possible, by sweeping or wiping, or washing with as little water as possible
2. Rooftop drains or downspouts will be arranged so they don't drain directly onto paved surfaces wherever possible
3. The storm water conveyance system will be kept clear of debris and litter to avoid blockage that may cause storm water to back up and to avoid the discharge of illicit materials
4. Storm drain inlets will be cleaned regularly to remove sediment and debris
5. Inlets will be inspected after each large storm to remove debris; and determine whether additional facility BMPS may be required
6. Catch basins will be cleaned out and repaired as needed, annually, shortly before the wet weather season

10.18. FACILITY AND MUNICIPAL CONSTRUCTION ACTIVITIES

This section describes the BMPs to be implemented for building repairs, remodeling, and minor construction projects that involve an area of disturbance less than one acre is size.

Larger-scale projects, such as the construction of new facilities that involve greater than one acre of earth disturbing must satisfy the requirements of the Lorain County Erosion and Sediment Control Rules as well as the Ohio EPA Construction General Permit. These require more extensive storm water pollution prevention measures than described here.

The following BMPs will be implemented for minor construction and remodeling activities:

1. Building materials will be stored under cover or in contained areas. Impermeable tarps will be put over piles of wood, or other materials
2. The working area will be kept clean. Wood splinters, paint chips, and other residues will be swept every day; A thorough cleanup should be provided at the end of the project
3. Impermeable ground cloths, such as plastic sheeting, will be used during painting
4. Paint buckets and barrels of materials will be stored away from contact with storm water at the end of the work day
5. Paint spills will be treated as a chemical spill and will be captured before draining to the storm drain. Paint will be cleaned up promptly using dry methods

6. Water based paint brushes and equipment will be cleaned in a sink connected to the sanitary sewer. Oil-based paint materials will be cleaned where the waste paint and solvents can be collected to be handled as small quantity hazardous waste - do not pour it to the sink or to a storm drain

7. Tarps or drop cloths will be hung to minimize the spread of windblown materials

8. Sand blasting areas will be controlled to keep particles off of paved surfaces and out of storm drains

9. Excess chemicals will be soaked up with absorbent material or rags rather than allowing them to flow to the storm drains or soak into the soil. If chemicals spill, they will be cleaned up promptly using dry techniques(See Section 3.3)

10.19. STORM WATER MANAGEMENT: WATER QUALITY CONTROLS

The following features can be used on various parts of the storm water conveyance system in the SWD, if needed, to help control potential pollutants in the storm water before it leaves the site:

1. Oil-Absorbent Materials **-** Oils and greases in storm water can be removed using oil absorbent materials to contain oil spills. The absorbent material preferentially absorbs oil, and does not fill with water, so it can be used on storm water with small concentrations of oily materials

2. Permanent floating booms - Installed in storm water ditches to control occasional light-surface sheen. When the boom is spent, it is full of oil and is visibly heavier, and floats lower in the water. The booms are inexpensive enough that they may easily be replaced whenever the absorbent is saturated

3. Vegetated Swale or Channel **-** Plants provide peak flow control by slowing the water and remove some pollutants by encouraging the deposition of sediments and intercepting oily wastes that may be in the water. This control can be retrofitted to an existing storm water conveyance simply by allowing grasses to grow, as long as it does not interfere with storm water drainage and cause water to back up onto the site

4. Catch Basin Filters - Storm drain inlets or inlet inserts that contains filtration media or other design features to removes particulates and oily wastes from storm water as it enters the storm drain.

11. REPORTING AND RECORD KEEPING REQUIREMENTS

This document and the facility operations shall be reviewed and updated annually to reflect changing site conditions and the effectiveness of the BMPs utilized in the SWD. All changes to this PPGHP will be documented. A copy of this document and any revisions to the program described herein will be kept onsite at the County, Township and Municipality sites listed in Section 2.0, at all times. A copy of all

documentation shall be forwarded to the Storm Water Managers at the following address for inclusion in the Annual Report by December 31st of each year.

Don Romancak
Lorain County Storm Water District
Lorain County Administration Building, Fifth Floor
226 Middle Ave
Elyria, Oh 44035

Email: romancakd@loraincounty.us

11.1. ANNUAL SITE INSPECTION

Facility managers will conduct yearly inspections of the municipal site operations at the County, Township and Municipality sites listed in Section 2.0 before December 31st of each year using the Annual Site Inspection Form provided in Appendix E. The completed form should be kept onsite indefinitely and a copy should be sent promptly to Don Romancak as outlined in Section 4.

11.2. NON-STORM WATER DISCHARGE VISUAL INSPECTION

Facility Managers should conduct at least quarterly (4) non-storm water discharge visual inspections of the County, Township and Municipality sites listed in Section 2 within TMDL regulated communities or that discharge to a regulated waterbody (Lorain County, Elyria Township and City of Oberlin Facilities). Facility Managers should conduct at least annually non-storm water discharge visual inspections of the County, Township and Municipality sites listed in Section 2 outside of a TMDL regulated communities or that do not discharge to a regulated waterbody (Village of South Amherst Maintenance Facility, Fire station and Sheffield Township Maintenance Facility). These inspections should occur a minimum of 72 hours after the last 1/2" rainfall to ensure that the source of any outfalls with flowing water is not storm water. A non storm water discharge visual inspection form is provided in Appendix C. The completed form should be kept onsite indefinitely and a copy should be sent promptly to Don Romancak as outlined in Section 4.

12. ALLOWABLE NON-STORM WATER DISCHARGES

The MS4 permit requires permit holders to address the following categories of non-storm water discharges if they are identified as significant contributors of pollutants to the MS4:

1. water line flushing
2. landscape irrigation
3. diverted stream flows
4. rising ground waters
5. uncontaminated ground water infiltration
6. uncontaminated pumped ground water
7. discharges from potable water sources
8. foundation drains
9. air conditioning condensation
10. irrigation water
11. springs
12. water from crawl space pumps
13. footing drains

14. lawn watering
15. individual residential car washing
16. flows from riparian habitats and wetlands
17. dechlorinated swimming pool discharges
18. street wash water
19. fire fighting activities

These non-storm water discharges for the SWD have not been identified as significant contributors of pollutants to the MS4 and therefore are not addressed as part of this program. If such activities are found to be significant contributors of pollutants to the MS4 during field investigations, they will be addressed at such time.

Appendix A – Facility/Operations Storm Water Inspection Checklist

Facility/Operations Storm Water Inspection Checklist

Municipal Facilities/Operations Pollution Prevention/Good Housekeeping Program

Year: _____ **Location:** _____

Item	Date Completed
Annual Site Inspection	
NON- STORM WATER INSPECTIONS	
Non-Storm Water Visual Inspection	
Non-Storm Water Visual Inspection	
Non-Storm Water Visual Inspection	
Non-Storm Water Visual Inspection	
Non-Storm Water Visual Inspection	
Non-Storm Water Visual Inspection	
Non-Storm Water Visual Inspection	
Non-Storm Water Visual Inspection	
STORM WATER INSPECTIONS	
Storm Water Visual Inspection	
Storm Water Visual Inspection	
Storm Water Visual Inspection	
Storm Water Visual Inspection	
Storm Water Visual Inspection	
Storm Water Visual Inspection	
Storm Water Visual Inspection	
Storm Water Visual Inspection	

Promptly forward a copy of this form to Don Romancak (See Section 4) **when completed. The original should be kept onsite.**

Appendix B – Spill / Release Incident Reporting Form

Spill/Release Incident Reporting Form

Municipal Facility/Operations Pollution Prevention/Good Housekeeping Program

1. Date of spill/release: _____

2. Location: _____

3. Time of spill/release: _____ a.m. / p.m.

4. Material spilled/released: _____

5. Amount spilled/released: _____

6. Cause of spill/release: _____

Promptly forward a copy of this form to
Don Romancak
(See Section 4)
when completed. The original should be kept onsite.

7. Description of scene (e.g., type of media contaminated (e.g., soil), distance to storm sewers, if spill/release was contained):
_____
_____
_____
_____

8. Description of clean-up actions taken (e.g., how spill/release was contained (e.g., absorbent pillows), where recovered material was placed, how much material was not recovered, remaining actions to be taken): _____
_____
_____
_____
_____

9. List of offsite emergency responders contacted:
_____ _____
_____ _____
_____ _____

10. List of offsite emergency responders at scene:
_____ _____
_____ _____
_____ _____

11. Action taken to prevent recurrence: _____
_____
_____
_____

12. Signature: _____

Printed Name: _____

Use back of form for additional space as needed. Completed forms should be kept onsite.

Appendix C – Non-Storm Water Discharge Visual Inspection Form

Routine Facility Inspection Report for MS4 Service Department

General Information			
Facility Name and MS4 Operator			
NPDES Permit No.			
Date of Inspection		**Start/End Time**	
Inspector's Name(s)			
Inspector's Title(s)			
Inspector's Contact Information			
Inspector's Qualifications			

Weather Information
Weather at time of this inspection? ❑ Clear ❑Cloudy ❑ Rain ❑ Sleet ❑ Fog ❑ Snow ❑ High Winds ❑ Other: Temperature:
Have any previously unidentified discharges of pollutants occurred since the last inspection? ❑Yes ❑No **If yes, describe:**
Are there any discharges occurring at the time of inspection? ❑Yes ❑No **If yes, describe:**

Structural Control Measures

- *Number the structural stormwater control measures identified in your SWPPP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.*
- *Measures may include, but are not limited to, oil-water or hydrodynamic separators; storm water management ponds; bioretention areas; permeable pavement; cisterns; sand or other media filters; berms or curbs; covers such as tarps, roofs and lids; secondary containment structures; erosion and sediment controls, catch basin screens, sumps and inserts, spill kits, etc.*
- *Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.*

	Structural Control Measure	**Control Measure is Operating Effectively?**	**If No, In Need of Maintenance, Repair, or Replacement?**	**Corrective Action Needed and Notes** (identify needed maintenance and repairs, or any failed control measures that need replacement)
1		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
2		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
3		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
4		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Notes (identify needed maintenance and repairs, or any failed control measures that need replacement)
5		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
6		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
7		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
8		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
9		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	
10		❑Yes ❑No	❑ Maintenance ❑ Repair ❑ Replacement	

Areas of Industrial Materials or Activities Exposed to Storm Water

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
1	**Vehicle maintenance areas (mechanical repairs, body work, oil changes, etc.)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
2	**Vehicle washing area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
3	**Equipment cleaning (includes lawn mowers)**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
4	**Outdoor vehicle and equipment storage/parking areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
5	**Fueling stations**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
6	**Salt and salt-containing material storage, loading and mixing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
7	**Snow disposal yard**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
8	**Storage yard for scrap, spare or unused materials and equipment**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

	Area/Activity	Inspected?	Controls Adequate (appropriate, effective, and operating)?	Corrective Action Needed and Notes
9	**Sand, dirt, ditch cleanings, mulch and aggregate storage piles**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
10	**Catch basin cleanings and street sweepings dewatering and solids management areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
11	**Yard waste storage and processing areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
12	**Leaf collection area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
13	**Composting area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
14	**Pesticide, herbicide & fertilizer storage and application areas**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
15	**Hazardous waste collection area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
16	**Used oil storage drums and tanks**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
17	**Waste dumpsters**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
18	**Recycling area**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
19	**Impound lot**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
20	**Dust generation and off-site vehicle tracking**	❑Yes ❑No ❑ N/A	❑Yes ❑No	
21	**Indicators of illicit discharge**	❑Yes ❑No ❑ N/A	❑Yes ❑No	

Non-Compliance

Describe any incidents of non-compliance observed and not described above:

Additional Control Measures

Describe any additional control measures needed to comply with the permit requirements:

Notes

Use this space for any additional notes or observations from the inspection:

CERTIFICATION STATEMENT

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Print name and title: _____

Signature:_____Date:_____

Appendix D – Comprehensive Annual Site Inspection Form

NPDES Permit Tracking No.:
N/A

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

Annual Reporting Form

A. GENERAL INFORMATION

1. Facility Name: Sheffield Twp Maint. Facility

2. NPDES Permit Tracking No.: N/A

3. Facility Physical Address:

a. Street: 51666 Clinton Ave

b. City: Lorain c. State: OH d. Zip Code: 44050-

4. Lead Inspectors Name: Title:

Additional Inspectors Name(s):

5. Contact Person: Title:

Phone: - - Ext. E-mail:

6. Inspection Date: / /

B. GENERAL INSPECTION FINDINGS

1. As part of this comprehensive site inspection, did you inspect all potential pollutant sources, including areas where industrial activity may be exposed to stormwater?
☐ YES ☐ NO

If NO, describe why not:

NOTE: *Complete Section C of this form for each industrial activity area inspected and included in your SWPPP or as newly identified in B.2 or B.3 below where pollutants may be exposed to stormwater.*

2. Did this inspection identify any stormwater or non-stormwater outfalls not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, for each location, describe the sources of those stormwater and non-stormwater discharges and any associated control measures in place:

NPDES Permit Tracking No.:
N/A

3. Did this inspection identify any sources of stormwater or non-stormwater discharges not previously identified in your SWPPP? ☐ YES ☐ NO

If YES, describe these sources of stormwater or non-stormwater pollutants expected to be present in these discharges, and any control measures in place:

4. Did you review stormwater monitoring data as part of this inspection to identify potential pollutant hot spots? ☐ YES ☐ NO ☐ NA, no monitoring performed

If YES, summarize the findings of that review and describe any additional inspection activities resulting from this review:

5. Describe any evidence of pollutants entering the drainage system or discharging to surface waters, and the condition of and around outfalls, including flow dissipation measures to prevent scouring:

6. Have you taken or do you plan to take any corrective actions, as specified in Part 3 of the permit, since your last annual report submission (or since you received authorization to discharge under this permit if this is your first annual report), including any corrective actions identified as a result of this annual comprehensive site inspection?
☐ YES ☐ NO

If YES, how many conditions requiring review for correction action as specified in Parts 3.1 and 3.2 were addressed by these corrective actions? ☐☐

NOTE: *Complete the attached Corrective Action Form (Section D) for each condition identified, including any conditions identified as a result of this comprehensive stormwater inspection.*

NPDES Permit Tracking No.:

N/A

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description**:**

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised control measures necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised c necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:

N	/	A							

NOTE: *Copy this page and attach additional pages as necessary*

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? ☐ YES ☐ NO

3. Have any control measures failed and require replacement? ☐ YES ☐ NO

4. Are any additional/revised BMPs necessary in this area? ☐ YES ☐ NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

NPDES Permit Tracking No.:
N/A

D. CORRECTIVE ACTIONS

Complete this page for each specific condition requiring a corrective action or a review determining that no corrective action is needed. Copy this page for additional corrective actions or reviews.

Include both corrective actions that have been initiated or completed since the last annual report, and future corrective actions needed to address problems identified in this comprehensive stormwater inspection. Include an update on any outstanding corrective actions that had not been completed at the time of your previous annual report.

1. Corrective Action # ___ of ___ for this reporting period.

2. Is this corrective action:

- ☐ An update on a corrective action from a previous annual report; or
- ☐ A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- ☐ Unauthorized release or discharge
- ☐ Numeric effluent limitation exceedance
- ☐ Control measures inadequate to meet applicable water quality standards
- ☐ Control measures inadequate to meet non-numeric effluent limitations
- ☐ Control measures not properly operated or maintained
- ☐ Change in facility operations necessitated change in control measures
- ☐ Average benchmark value exceedance
- ☐ Other (describe): _____

4. Briefly describe the nature of the problem identified:

5. Date problem identified: __/__/____

6. How problem was identified:

- ☐ Comprehensive site inspection
- ☐ Quarterly visual assessment
- ☐ Routine facility inspection
- ☐ Benchmark monitoring
- ☐ Notification by EPA or State or local authorities
- ☐ Other (describe): _____

7. Description of corrective action(s) taken or to be taken to eliminate or further investigate the problem (e.g., describe modifications or repairs to control measures, analyses to be conducted, etc.) or if no modifications are needed, basis for that determination:

8. Did/will this corrective action require modification of your SWPPP? ☐ YES ☐ NO

9. Date corrective action initiated: __/__/____

10. Date correction action completed: __/__/____ or expected to be completed: __/__/____

11. If corrective action not yet completed, provide the status of corrective action at the time of the comprehensive site inspection and describe any remaining steps (including timeframes associated with each step) necessary to complete corrective action:

NPDES Permit Tracking No.:
N/A

E. ANNUAL REPORT CERTIFICATION

1. Compliance Certification

Do you certify that your annual inspection has met the requirements of Part 4.2 of the permit, and that, based upon the results of this inspection, to the best of your knowledge, you are in compliance with the permit? ☐ YES ☐ NO

If NO, summarize why you are not in compliance with the permit:

2. Annual Report Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Authorized Representative Printed Name: Title:

Signature: Date Signed:

Exhibit 9 – IDDE program

LORAIN COUNTY

STORM WATER DISTRICT

Illicit Discharge Detection & Elimination Program

December, 2021

Prepared by:

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LIST OF ACROYNMS/ABBREVIATIONS

BMP	Best Management Practice
CWP	Center for Watershed Protection
EPA	Environmental Protection Agency
GIS	Geographic Information System
GPS	Global Positioning System
HSTS	Household Sewage Treatment System
IDDE	Illicit Discharge Detection and Elimination
LCGHD	Lorain County General Health District
LCPIPE	Lorain County Public Information & Public Education
MCM	Minimum Control Measure
MS4	Municipal Separate Storm Sewer System
NPDES	National Pollutant Discharge Elimination System
ORC	Ohio Revised Code
O & M	Operation and Maintenance
PPGHP	Pollution Prevention and Good Housekeeping Program
SWD	Lorain County Storm Water District
SWMP	Storm Water Management Program
SWP3	Storm Water Pollution Prevention Plan

1. INTRODUCTION

On December 27, 2002 Ohio EPA issued an NPDES General Permit (Permit No.: OHQ000001) to authorize small Municipal Separate Storm Sewer Systems (MS4s) to discharge storm water under the National Pollutant Discharge Elimination System (NPDES). The OEPA has issued three renewals to the permit (2009, 2014, 2021), with the latest being OHQ00004 (2021). Each of the subsequent permits have added to the requirements of OHQ000001. Illicit Discharge Detection and Elimination is one of the six minimum control measures (MCM) required by the current permit. This plan outlines the Illicit Discharge Detection and Elimination Program (IDDE) that has been developed by the Lorain County Storm Water District (SWD) to meet the requirements of the NPDES General MS4 Permit which will be subsequently referred to as the MS4 permit.

While the SWD is comprised of all of the unincorporated areas of Lorain County, the Village of South Amherst and the City of Oberlin, this IDDE program is mainly developed for the MS4 permit regulated areas. Under the MS4 permit the County, eight of the Townships, the Village of South Amherst and the City of Oberlin are considered small MS4s and are regulated. The regulated areas are further scaled down to those areas considered urbanized by the United States Census. For purposes of this program the urbanized areas will be referred to as the MS4 Permit area. Lorain County is the permit holder for the SWD with the eight regulated Townships, the Village of South Amherst and the City of Oberlin each being co-permittees. The MS4 communities listed as co-permittees of the County are:

- Amherst Township
- Carlisle Township
- Columbia Township
- Eaton Township
- Elyria Township
- Grafton Township
- Sheffield Township
- Henrietta Township
- City of Oberlin
- Village of South Amherst

Illicit Discharge is defined by the MS4 permit as "any discharge to a Municipal Separate Storm Sewer System that is not composed entirely of storm water, except discharges authorized under an NPDES permit (other than the NPDES permit for discharges from the MS4) and discharges resulting from fire fighting activities." A full definition of illicit discharge can be found at 40 CFR 122.26(b)(2).

2. IDDE PROGRAM ELEMENTS

2.1. STORM MAP

The MS4 permit requires that all MS4s complete a comprehensive storm sewer system map, showing the location of all outfalls and the surface waters of the State receiving discharges from these outfalls. In addition, within five years of coverage under the general permit, the MS4 is required to map the entire MS4 including catch basins, pipes, ditches, flood control facilities, post construction water quality BMPs and private post construction water quality BMPs. The permit also

requires that a Household Sewage Treatment System (HSTS) map be developed showing outfalls of all HSTS's to the MS4 along with an inventory of said HSTS's.

2.1.1. Storm Sewer Outfall Inventory and Mapping

The SWD has developed a comprehensive map for all of the MS4 permit areas. This includes only those areas that are unincorporated, urbanized and within County or Township right of way. A long term goal would be to also incorporate the City of Oberlin and Village of South Amherst information into this map. Prior to the development of the SWD, Lorain County completed mapping of the MS4 including storm sewer, ditches and outfalls, within County right of way. The result of this effort was AutoCAD mapping with geo referenced imagery. To bring this map into compliance with permit requirements, the map was updated to include storm sewer structures along with public and private post construction water quality BMP's.

The SWD has since developed GIS mapping for the unincorporated urbanized areas for Lorain County. Currently there is a combination of heads-up digitized and field located information. Additionally, all of the outfalls within the County and regulated Townships, along with all of the outfalls for the City of Oberlin and Village of South Amherst have been dry weather screened at least once. The GIS mapping has come from a combination of CAD data provided by the Lorain County Engineer, survey data, GIS shapefiles of unknown origin provided by Lorain County GIS, sub-meter non-picture capable GPS units, and Sub-Centimeter picture capable GPS Units. The SWD has executed an action plan which includes development of standard documentation format, development of naming convention format and data management procedures.

The GIS Mapping has been set up to record the following information:

1. Outfalls (Any storm water conveyance (ie. storm sewer, ditch, etc.) that discharges from the MS4 to surface waters of the State)
    a. ID
    b. Outfall No.
    c. Coordinates
    d. Road No.
    e. Side of Road
    f. Type (Ditch, Storm Sewer)
    g. Receiving Water Body
    h. Owner
    i. Date
    j. Photo

2. Storm Sewers
    a. ID
    b. Road No.
    c. Size
    d. Material

e. Length
f. Slope
g. Upstream Structure
h. Downstream Structure
i. Owner
j. Date Installed

3. Storm Structures (Catch Basins / Manholes)
   a. ID
   b. Coordinates
   c. Road No.
   d. Rim Elevation
   e. Inverts
   f. Condition
   g. Owner
   h. Date Installed
   i. Photo

4. Ditches
   a. ID
   b. Condition
   c. Owner
   d. Photo

5. Flood Control Facilities/Post Construction Water Quality BMP's/Private Post Construction Water Quality BMP's
   a. ID
   b. Type
   c. Outer Boundary Coordinates
   d. Owner
   e. Date Installed
   f. Photo

Structures will be assigned an ID number through the following naming convention:

Structure Type	Community (3 letter community designation followed by community type designation)	Structure Sequential Number	Structure Id Number
OF – Outfall	ELYTWP	001	OF001ELYTWP
IN – Inlet (CB or Yard Drain)	OBECTY	001	IN001OBECTY
MH – Manhole	LORCNTY	001	MH001LORCNTY
OL – Outlet (Any pipe outlet that does not count as an outfall)	LAGVLG	001	OL001LAGVLG
PI – Pipe Inlet	ELYTWP	001	PI0001ELYTWP
DP - Ditch Point (Start or End)	ELYTWP	001	DP001ELYTWP

For the MS4 features that have not been recorded previously, field survey should be performed to locate and log the features. During the field survey of the outfalls, an Outfall Inventory Form should be filled out and dry weather screenings (as described in Section 2.3.1.2) should be performed on as many outfalls as possible to limit the number of times field work is necessary. The Outfall Inventory Form is found in Exhibit 1 and a sample form is also shown on Figure 1 on page 8. Dry weather screenings are covered in detail under Section 2.3.1.2.

In order to maintain current mapping the SWD should perform an annual review of new development using construction and/or as built drawings. The MS4 features from these drawings should be added to the GIS system and any new outfalls will be tagged for dry weather screenings.

OUTFALL INVENTORY FORM

Office Data

Form No:	1		
Road No:	CR16	**Outfall No:**	OFCR1602.276L
Linear Reference:	2.276L	**GIS Id:**	
Reference Cross Road:	Butternut Ridge Rd.	**Linear Reference at Cross Road:**	2.012

Field Data

Date:	06/20/12	**Collected from:**	X	Previous Mapping		Field Survey	
OH State Plane N:	599842.06	**Road Name:**	Pyle S. Amherst Rd.				
OH State Plane E:	2040558.30	**Receiving Stream:**	Unnamed Tributary of Beaver Creek				
Outfall Type:		Pipe	X	Ditch			

Pipe Outfalls					Ditch Outfalls				
Shape:		Circular		Rectangular	**Rock Channel Protection:**		Yes	X	No
		Elliptical		Other	**Bottom Width (in):**	Not measured			
Height in):	**Width (in):**				**Outfall Condition:**		Good	X	Fair
Material:		RCP		VCP			Poor		NA
		CMP		PVC	**Side of Road:**		Left		Right
		CPP		Other	**Performed DWS:**	X	Yes		No

Photo:

Location Map:

Comments:

Data taken from mapping from County Engineer performed in 2006.

Figure 1 - Sample Outfall Inventory Form

2.1.2. Household Sewage Treatment System (HSTS) Inventory and Mapping

One of the goals of the SWD, which has been met, was to develop a HSTS inventory and mapping in accordance with the MS4 permit which required the following:

1. A list of all on-site sewage disposal systems that discharge to your MS4 including the addresses
2. A storm sewer map showing the location of all HSTSs connected to your MS4. This map shall include details on the type and size of conduits/ditches in your MS4 that receive discharges from HSTS's, as well as the water bodies receiving the discharges from your MS4.

The Lorain County General Health District (LCGHD) in conjunction with the GIS department developed a map and list of all known HSTSs within the County. In order to meet permit requirements, this map has been updated to include:

1. locations where the HSTSs with discharge connect to the MS4;
2. the conduits/ditches that receive discharge and;
3. the water bodies receiving those discharges from the MS4.

The SWD should maintain a list of the HSTSs that includes information on address, type of system, type of discharge, installation date, inspection date, pumping and maintenance date. The database is linked to the County GIS system and allows the SWD to locate the HSTS's geographically. The list should be updated as new HSTSs are installed. Coordination between the LCGHD and the SWD is required to ensure that the information on all new HSTSs permitted by the LCGHD with discharge to the MS4 is provided to the SWD in order to keep the HSTS map and inventory current.

2.2. ILLICIT DISCHARGE PROHIBITION

The MS4 permit states that you must "to the extent allowable under State or Local law, effectively prohibit, through ordinance, or other regulatory mechanism, illicit discharges into your storm sewer system and implement appropriate enforcement procedures and actions."

Lorain County passed Resolution No. 10-417 on June 23, 2010 which prohibits illicit discharges and illegal connections into the MS4 as well as Resolution No. 10-418, approving a Memorandum of Understanding between the County and MS4 communities to detect and eliminate illicit discharges. The objective of the resolutions is:

1. to prohibit illicit discharges and illegal connections to the MS4 and;

2. to establish legal authority to carry out inspections, define monitoring procedures, and outline enforcement actions necessary to ensure compliance with this regulation.

Copies of the resolutions are attached as Exhibit 3 – Illicit Discharge Resolutions.

2.3. ILLICIT DISCHARGE DETECTION AND ELIMINATION PLAN

A mandatory requirement of the MS4 permit is to "develop and implement a plan to detect and eliminate non-storm water discharges, including illegal dumping, to your system". EPA recommends that this plan include the following components:

- Locate priority areas through hot spots, dry weather screenings and water quality sampling
- Trace the source of illicit discharges
- Eliminate the source of illicit discharges
- Program evaluation and assessment

2.3.1. Locate Priority Areas

Priority Areas will be identified by the SWD by:

1. reviewing possible hot spots within the MS4;
2. performing and reviewing dry weather screenings and;
3. performing water quality sampling as needed

2.3.1.1. Hot Spots

Potential hot spots include areas with aging sanitary sewer lines, locations where complaints are common, locations with previously documented illicit discharges and locations where dry weather screenings indicate problem areas. Older infrastructure areas may have a higher percentage of illegal connections and/or have deteriorating sewer leading to added problems. Commercial and/or industrial areas of the community tend to have a higher percentage of illicit discharges as well.

The SWD should perform a review of the hot spots within the MS4, and from this review develop a report indicating areas warranting further Illicit Discharge investigation along with the type of investigation required for each hot spot.

2.3.1.2. Dry Weather Screenings

Dry weather screenings are performed on MS4 outfalls to identify dry weather flows which can be an indication of an illicit discharge. Screenings are a visual inspection of the outfall and should occur at least 72 hours after the last rainfall over 0.10 inches. Dry weather screenings should be performed on all of the MS4 outfalls once during each permit term.

Initial screenings were completed by the end of 2015. For each subsequent five year MS4 permit term, screenings on all outfalls should be performed at 20% per year to ensure that all outfalls are screened at least once every five years.

The IDDE Field Guide (Exhibit 2) outlines information on how to safely perform inspections, what to look for during field inspection and provides a form to be used for the dry weather screenings as well as all other illicit discharge inspections.

When the dry weather screening indicates the presence of an illicit discharge, it is recommended that field personnel revisit the outfall withintwo weeks after the initial visit to rescreen.

2.3.1.3. Water Quality Sampling

Detection of an illicit discharge will involve field investigation as part of the outfall observation and investigation program. Following dry weather screening of outfalls and review of potential hotspots, further field investigation may be required to determine what contaminants are associated with dry weather flows. If flows are present during dry weather screenings, but there are no visual indicators, water quality sampling can help determine if an illicit discharge is responsible for the flow.

Water Quality Sampling will utilize the information obtained from the outfall mapping component of the IDDE program, including the maps indicating where the numbered outfalls are located and the Illicit Discharge Detection forms filled out for the dry weather screenings. This will allow for ease of locating known MS4 outfall locations and provide background information on previous visual observations so that appropriate water quality sampling can be performed.

Water Quality Sampling must be performed in a safe manner with quality assurance measures in place to ensure that samples collected are not contaminated. Exhibit 4- Illicit Discharge Detection and Tracking Guide, a guide from the Center for Watershed Protection, outlines measures to be taken during water quality sampling. Page 11 of the Guide provides field preparation instructions and page 15 begins the procedures that should be used for collecting water quality samples. The IDDE field guide (Exhibit 2) also provides testing procedures that can be followed for sample collection. It is important to note that samples for lab work should be taken in accordance with instructions and recommendations from the Laboratory of choice to ensure a quality sample.

Samples collected need to be sent to the laboratory for analysis. The Flow Chart Method from the Center for Watershed Illicit Discharge Detection and Elimination: A Guidance Manual is a relatively simple technique that analyzes four indicator parameters for four major discharge types found in residential watersheds. The basic decision points involved in the Flow Chart Method are shown in Figure 1 on the next page.

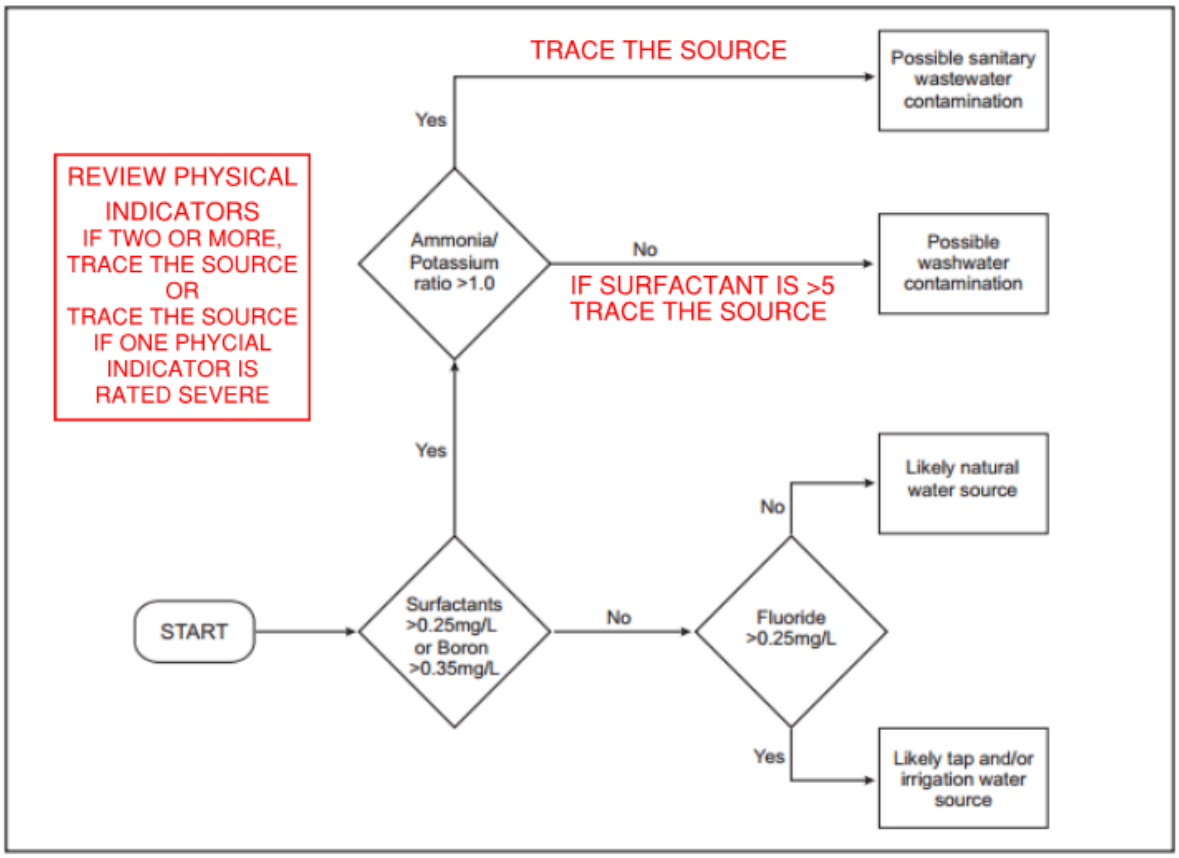

Figure 1 – Flow Chart to Identify Illicit Discharges in Residential Watersheds

Based on the above flow chart, the four parameters analyzed are surfactants, ammonia, potassium and fluoride. With these four parameters, the discharge can be narrowed down to the likely contamination source if any. These parameters have further usefulness in determining potential for industrial discharges based on Figure 2 - Industrial Discharge Indicators, on the next page, which also come from the Center for Watershed Illicit Discharge Detection and Elimination: A Guidance Manual.

Industrial Benchmark Concentration	Detergents as Surfactants (mg/L)	Ammonia (mg/L)	Potassium (mg/L)	Initial "Flow Chart" Class	Color (Units)	Conductivity (:S/cm)1	Hardness (mg/L as $CaCO_3$)	pH	Turbidity (NTU)	Best Indicator Parameters to Identify This Flow Type	Additional Indicator Parameters to Identify This Flow Type
	--	≥50	≥20		≥500	≥2000	≤10 ≥2,000	≤5	≥1,000		
Concentrations in Industrial and Commercial Flow Types											
Automotive Manufacturer[1]	5	0.6	66	Wash water	15	220	30	6.7	118	Potassium	
Poultry Supplier[1]	5	4.2	41	Wash water	23	618	31	6.3	111	Potassium	
Roofing Product Manufacturing[1]	8	10.2	27	Wash water	>100[2]	242	32	7.1	229	None	Potassium Color
Uniform Manufacturing[1]	6	6.1	64	Wash water	>100[2]	798	35	10.4	2,631	Potassium	Color Turbidity
Radiator Flushing	15	(26.3)	(2,801)	Wash water	(3,000)	(3,278)	(5.6)	(7.0)	-	Potassium Conductivity Color	Hardness
Metal Plating Bath	7	(65.7)	(1,009)	Wash water	(104)	(10,352)	(1,429)	(4.9)	-	Ammonia Potassium Conductivity Hardness	pH
Commercial Car Wash	140	0.9; (0.2)	4; (43)	Wash water	>61; (222)	274; (485)	71; (157)	7.7; (6.7)	156		Potassium Turbidity
Commercial Laundry	(27)	(0.8)	3	Wash water	47	(563)	(36)	(9.1)	-		

Best Indicators, shaded in pink, distinguish this source from residential wash water in 80% of samples in both Tuscaloosa and Birmingham, AL.
Supplemental indicators, shaded in yellow, distinguish this source from residential wash water in 50% of samples, or in only one community.
(Data in parentheses are mean values from Birmingham); Data not in parentheses are from Tuscaloosa
[1] Fewer than 3 samples for these discharges.
[2] The color analytical technique used had a maximum value of 100, which was exceeded in all samples. Color may be a good indicator of these industrial discharges and the benchmark concentration may need adjustment downward for this specific community.

Figure 2 – Industrial Discharge Indicators

2.3.1.4. Complaint Tracking Plan

The Stormwater Management District can be contacted in person, phone, mail or email about storm water related inquiries, complaints or violation reporting. Complaints will be documented in a tracking system and field investigation will be conducted in conjunction with the dry weather screening or in response to the complaint.

2.3.2. Trace Source of Illicit Discharges

Once an illicit discharge has been detected, the next step is to locate the source of that discharge. The prioritization for tracing illicit discharges to their source will be based on factors such as whether the area is known to have high bacteria problems or vulnerability to bacterial contamination, contains significant industrial or commercial development, dense housing without a sanitary sewer collection system, public notification or complaints, and the sensitivity of the receiving stream. The basic process to follow for tracing an illicit discharge is shown in Figure 3 below.

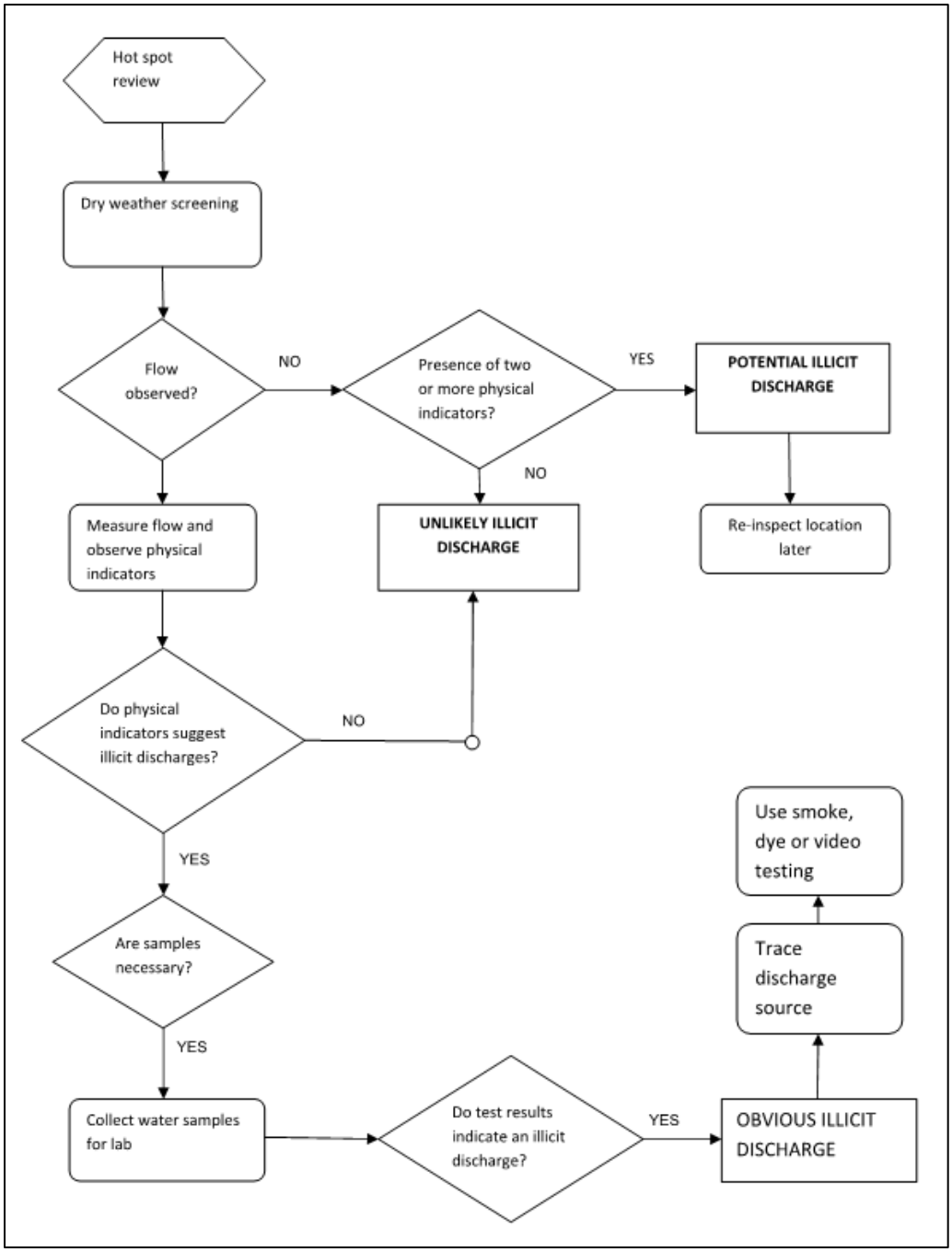

Figure 3 - Illicit Discharge Screening and Tracing Flow Process

The procedures to determine the source of illicit discharges may include the following activities depending on the location and type of discharge:

2.3.2.1. Dry Weather Inspections

This involves inspections along the storm water conveyance system. This can be easily accomplished along open ditches but is harder in a closed conveyance system. For closed conveyance systems, start inspecting at the initial detection location and work upstream,

opening and observing each manhole for flow, until there is minimal flow. Once a small area is isolated, a building to building evaluation should be used to isolate the source.

2.3.2.2. Dye Testing

In some cases, once the source area of the potential illicit discharge source is identified, the utilization of dye testing will assist in determining the exact location of the illicit discharge. Because access to the property is required, permission must be obtained from the property owner before the test. Testing is performed by pouring dye into sinks, toilets, etc and then flushed through the drainage system. The storm drains and sanitary sewers are monitored to observe where the dye discharges to. This procedure is effective in determining direct connections of sanitary lines to storm lines.

2.3.2.3. Televising/Video Inspections

Another method in determining where the illicit discharge source is televising the storm line. This can be completed by utilizing either a push or a self propelled CCTV camera. Both cameras will provide detailed information as to where the illicit discharge connections are located within the MS4 system.

2.3.2.4. Smoke Testing

This method can be used during special circumstances when a good storm sewer map is not available for an area and there are known illicit discharge issues. Smoke is introduced into the storm drainage system and will emerge at locations that are connected to that system. It is recommended that qualified personnel be used for this method to ensure accurate test results.

2.3.3. Elimination of Illicit Discharge

Developing and implementing an effective IDDE program requires the successful elimination of the illicit discharge once located. Lorain County has passed Resolution No. 10-417 on June 23, 2010 which prohibits illicit discharges and illegal connections into the MS4 as well as Resolution No. 10-418, approving a Memorandum of Understanding between the County and MS4 communities to detect and eliminate illicit discharges. The County's enforcement procedures per Resolution No. 10-417 are outlined as follows:

A. Notice of Violation. When the County finds that a person has violated a prohibition or failed to meet a requirement of this regulation, the County may order compliance by written Notice of Violation. Such notice must specify the violation and shall be hand delivered, and/or sent by registered mail, to the owner/operator of the facility. Such notice may require the following actions:

    1. The performance of monitoring, analyses, and reporting;
    2. The elimination of illicit discharges or illegal connections;
    3. That violating discharges, practices, or operations cease and desist;

4. The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property; or
5. The implementation of source control or treatment BMP's.

B. If abatement of a violation and/or restoration of affected property are required, the Notice of Violation shall set forth a deadline within which such remediation or restoration must be completed. Said Notice shall further advise that, should the facility owner/operator fail to remediate or restore within the established deadline, a legal action for enforcement may be initiated.

C. Any person receiving a Notice of Violation must meet compliance standards within the time established in the Notice of Violation.

D. Administrative Hearing: If the violation has not been corrected pursuant to the requirements set forth in the Notice of Violation, the County shall schedule an administrative hearing to determine reasons for non-compliance and to determine the next enforcement activity. Notice of the administrative hearing shall be hand delivered and/or sent registered mail. Administrative hearings shall be conducted by the Board of Commissioners or by any officer or body designated by the Board of Commissioners by further resolution.

E. Injunctive Relief: It shall be unlawful for any owner/operator to violate any provision or fail to comply with any of the requirements of this regulation pursuant to O.R.C. 3709.211. If an owner/operator has violated or continues to violate the provisions of this regulation, the County may petition for a preliminary or permanent injunction restraining the owner/operator from activities that would create further violations or compelling the owner/operator to perform abatement or remediation of the violation.

F. Once the removal of the illicit discharge has occurred, it will be confirmed by the County. An Investigation form should be completed for each instance of illegal discharge. Exhibit 2 includes an Illicit Discharge Detection Form which should be used to document the discharge.

2.3.4. Household Sewage Treatment System (HSTS) Plan

There are four main requirements to address regarding HSTSs within the MS4 permit:

2.3.4.1. Central Sewer Connection Plan

The MS4 permit states that you shall develop a plan "to proactively identify residences with existing individual discharging HSTSs that can be legally, feasibly and economically connected to central sewers."

The SWD plan is to perform a review to determine if there are existing individual discharging HSTSs that can be legally, feasibly and economically connected to central sewers. Focus

should be on those systems (if any) that are within 200' of an existing central sewer system. A map and list should be created which identifies the location and addresses of those parcels that meet the criteria.

2.3.4.2. HSTS Operations and Maintenance Program

The MS4 permit states that you shall work with the local board of health (LCPHD) "to develop or enhance a proactive Operation and Maintenance program which determines if existing discharging HSTSs are operating as designed and intended, and addresses those that are not operating as designed."

The LCPHD requires that all new discharging HSTSs in the County provide for operation and maintenance of the HSTS by contracting with a service provider for annual maintenance. This requirement is included in a deed restriction on the parcel with the HSTS. The SWD will work with LCPHD to develop an operation and maintenance program that will include inspection by the LCPHD of all of the discharging HSTSs in the MS4 permit area once every 10 years to determine if the existing HSTSs are operating as designed. For those that are not operating as designed the SWD will work with the LCPHD to determine a proper course of action as outlined in Section 2.3.4-3 following.

2.3.4.3. Illicit HSTS Discharge Elimination

The MS4 permits states that "actively investigate source(s) of contamination in outfalls identified during dry weather screening process. When a contamination source has been identified as a discharging HSTS that is not operating as designed and intended, work with the local board of health to determine a proper course of action".

When an HSTS discharge is determined to be the source of an illicit discharge, the SWD plan is to work with the LCPHD to determine a proper course of action. This may include requirement of proper operation and maintenance to bring the system into compliance, review of the central sewer connection plan and the sewer installation plan to determine if it is feasible to connect the household to a central sewer, requirement to construct a new system, requirement to obtain an NPDES permit and/or enforcement.

2.3.4.4. Sewer Installation Plan

The MS4 permit states that you shall "evaluate the planned or possible future installation of sewers for areas which contain high densities of discharging HSTSs."

The SWD plan is to review the HSTS map and evaluate the feasibility of installing central sewers in areas with a high density of discharging HSTSs. A schematic map may be developed showing possible installation options, however this plan will be under the authority of the Lorain County Sanitary Engineer and costs associated with design plan and construction of sanitary sewers shall be paid for utilizing designated sanitary funds.

2.3.5. Program Evaluation and Assessment

The Ohio EPA recommends that the IDDE Program have procedures for program evaluation and assessments. Procedures for program evaluation and assessment include an annual review of the program to determine effectiveness. A series of questions will be answered in the annual review as follows (Questions come from the IDDE guidance manual prepared by the Cuyahoga County Board of Health):

To effectively evaluate the program, a number of questions need to be asked and analyzed.

1. Evaluate priority areas within your community:
    a. Were these areas identified initially?
    b. Are these areas still appropriate to be a priority area?
    c. Have illicit discharges been located in these areas?
2. Detection Program
    a. Is the program effective? Need to reassess the program by determining what has been achieved. Look at the number of outfalls inventoried, the number visually inspected, the number that had dry weather flows and look at the overall percentages of these flows as part of your overall storm sewer system for the community.
    b. Cost effectiveness: What aspects of the program had the highest quality of effectiveness in relationship to cost?
    c. Number of illicit discharges detected utilizing each detection method (will assist to see what method is more effective).
3. Tracing Program
    a. What techniques were used?
    b. Were these methods successful?
    c. What techniques that were not used would be beneficial for next year?
    d. How many illicit sources were identified and eliminated?
4. Other
    a. If using water quality sampling, resample areas within the community to determine effectiveness of the removal of illicit discharges.
    b. Determine expenses how much time was spent by employees to determine overall cost for achieving a given result.

2.3.6. Non-Storm Water Discharges

The MS4 permit requires permit holders to address the following categories of non-storm water discharges if they are identified as significant contributors of pollutants to the MS4:

- water line flushing
- landscape irrigation
- diverted stream flows
- rising ground waters
- uncontaminated ground water infiltration
- uncontaminated pumped ground water

- discharges from potable water sources
- foundation drains
- air conditioning condensation
- irrigation water
- springs
- water from crawl space pumps
- footing drains
- lawn watering
- individual residential car washing
- flows from riparian habitats and wetlands
- dechlorinated swimming pool discharges
- street wash water
- fire fighting activities

These non-storm water discharges have not been identified as significant contributors of pollutants to the MS4 and therefore are not addressed as part of this program. If such activities are found to be significant contributors of pollutants to the MS4 during field investigations, they will be addressed at such time.

3. PUBLIC EDUCATION

The Illicit Discharge Public Education Program will be performed in conjunction with MCM #1 Public Education and Outreach. The County has established several mechanisms to educate the public about the hazards of illicit discharges and improper disposal of waste. As part of the Public Education and Outreach Program, Storm Water Quality Banners have been developed for posting at public events, a Website has been developed which provides information, webinars, and training sessions which are advertised through "Lorain County PIPE" to bring awareness to Illicit Discharge and how to prevent it. The Storm Water District has also created a hotline which is available on the Storm Water District website that anyone can call to report an illicit discharge. Finally, a public education plan will be developed annually as part of MCM#1 - Public Education and Outreach, which will address specific education messages and mechanisms for distributing the message.

The County and MS4 community's maintenance staff will be educated on Illicit Discharge, provided with the IDDE Field Guide and instructed on how to fill out and submit the Illicit Discharge Detection Form if Illicit Discharges are detected during road maintenance operations.

4. IDDE PLAN SUMMARY ACTION STEPS

The summary action steps provide a concise guide to the requirements necessary to implement the IDDE Plan and provide an estimated completion timeframe for planning purposes. The requirements of each action step are outlined in more detail per the program section listed below:

ACTION STEPS	COMPLETION	PROGRAM SECTION
1. Dry Weather Screening	DWS 20% of Outfalls each Year	2.3.1.2
2. Illicit Discharge Tracing	Trace up to 5 Illicit Discharges per Year	2.3.2
3. Illicit Discharge Elimination - Once source of Illicit Discharge is determined work within appropriate framework to eliminate the discharge	Annually	2.3.3 2.3.4.3
4. Public Education	Annually	3.0

5. CROSS CONNECTION EPA NOTIFICATION

Notify Ohio EPA if any of the following Illicit discharges are detected discharging to your small MS4: Illicit sanitary cross connections from industrial, commercial or multi-family sources; and Leaking or broken sanitary sewer lines that are actively contributing sewage to your small MS4. Notification shall include the location, general description, date, and approximate time the illicit discharge was discovered. Such notification shall be made to the appropriate Ohio EPA district office within twenty-four (24) hours of discovery of the source: Southeast District Office: sedo24hournpdes@epa.ohio.gov Southwest District Office: swdo24hournpdes@epa.ohio.gov Northwest District Office: nwdo24hournpdes@epa.ohio.gov Northeast District Office: nedo24hournpdes@epa.ohio.gov Central District Office: cdo24hournpdes@epa.ohio.gov

6. REFERENCES

The following references are incorporated throughout the Lorain County IDDE program and were very helpful in the development of this program.

Clermont County. 2005. “Field Strategies for Detecting Illicit Discharge”, October, 2005

Center for Watershed Protection. 2011. "Illicit Discharge Detection and Tracking Guide", December, 2011

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The Cuyahoga County Board of Health. 2006. “Illicit Discharge Detection and Elimination Manual, A Guidance Manual for Small Municipalities in the State of Ohio”, July, 2006

State of Ohio. “Ohio Revised Code”

State of Ohio Environmental Protection Agency. 2009. “Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm Water under the National Pollutant Discharge Elimination System”, January, 2009

State of Ohio Environmental Protection Agency. 2014. “Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm Water Under the National Pollutant Discharge Elimination System”, Setember, 2014

State of Ohio Environmental Protection Agency. 2021. “Authorization for Small Municipal Separate Storm Sewer Systems to Discharge Storm Water Under the National Pollutant Discharge Elimination System”, April, 2021

U.S. EPA. “Stormwater discharges From Municipal Separate Storm Sewer Systems (MS4s)”. http://cfpub.epa.gov/npdes/stormwater/munic.cfm

7. EXHIBIT

Exhibit 1 – Outfall Inventory Form

Exhibit 2 – Illicit Discharge Detection and Elimination Field Guide

Exhibit 3 - Illicit Discharge Resolutions

Exhibit 4 - Illicit Discharge Detection and Tracking Guide (CWP)

Exhibit 5 – IDDE Reporting Form

EXHIBIT 1 – Outfall Inventory Form

OUTFALL INVENTORY FORM

Office Data

Road No:	**Outfall No:**
Linear Reference:	**GIS Id:**

Field Data

Field Date:		**Collected from:**		Previous Mapping		Field Survey		
OH State Plane N:					**Road Name:**			
OH State Plane E:					**Receiving Stream:**			
Outfall Type:		Pipe		Ditch				

Pipe Outfalls					**Ditch Outfalls**				
Shape:		Circular		Rectangular	**Rock Channel Protection:**		Yes		No
		Elliptical		Other	**Bottom Width (in):**				
Height (in):		**Width (in):**			**Outfall Condition:**		Good		Fair
Material:		RCP		VCP			Poor		NA
		CMP		PVC	**Side of Road:**		Left		Right
		CPP		Other	**Performed DWS:**		Yes		No

Photo:	**Location Map:**

Comments:

EXHIBIT 2 – Illicit Discharge Detection and Elimination Field Guide

Illicit Discharge Detection and Elimination Field Guide

An **illicit discharge** is defined by the US EPA's Phase II Storm Water Regulations as "any discharge to an MS4 (Municipal Separate Storm Sewer System) that is not composed entirely of storm water..." with some exceptions. These exceptions include discharges from NPDES-permitted industrial sources and discharges from fire-fighting activities. Illicit discharges are considered "illicit" because MS4s are not designed to accept, process, or discharge such non-storm water wastes.

MS4 means a conveyance or system of conveyances (including roads with drainage systems, municipal streets, catch basins, curbs, gutters, ditches, man-made channels, or storm drains)
(i) Owned or operated by a State, city, township, county, district, association, or other public body (created by or pursuant to State law) including special districts under State law such as a sewer district, flood control district or drainage district, or similar entity, that discharges into waters of the state;
(ii) Designed or used for collecting or conveying storm water;
(iii) Which is not a combined sewer; and
(iv) Which is not part of a Publicly Owned Treatment Works

Illicit Discharge Testing Procedure

1. Go to site.
2. Put on flashers, put out cones, and put on orange vest (if needed)
3. Locate the outfall.
4. Gather equipment.
5. Take a picture of the outfall.
6. Make visual observations about the pipe, its condition, and the water flowing out of the pipe including color, odor, turbidity, and floatables.
7. If water sample will be collected, put on gloves.
8. Collect a water sample in a lab supplied bottle for lab analysis or sanitized container for on sight testing.
9. Put sample for lab in cooler with ice, or for on sight testing, rinse test tubes/meters with the water to be tested.
10. Run water quality tests on sample (see back of Field Guide for possible parameters and the testing supplies section for specific test kits).
11. Measure the flow rate using the appropriate sized bucket/container
12. Rinse probes with distilled water.
13. Complete necessary paperwork.
14. Check to make sure all equipment is collected before leaving the site.

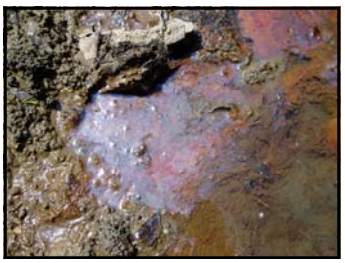
Stormwater testing supplies

- ❑ **Conductivity Meter**
- ❑ **pH Meter**
- ❑ **Nitrate Test Kit**
- ❑ **Phosphate Test Kit**
- ❑ **Camera**
- ❑ **Latex Gloves**
- ❑ **Hand Cleaner**
- ❑ **Wet Wipes**
- ❑ **First Aid Supplies**
- ❑ **Bug Repellant**
- ❑ **Poison Ivy Cleanser**
- ❑ **Poison Ivy Repellant**
- ❑ **Writing Utensils**
- ❑ **Maps**
- ❑ **Storm Water Forms**
- ❑ **Unopened 100 mL sample bottles**
- ❑ **Extendable Water Sampling Pole w/bottle**
- ❑ **Distilled Water**
- ❑ **Flashlight**
- ❑ **GPS Unit**
- ❑ **Tape Measure**
- ❑ **Cones**
- ❑ **Safety Vest**
- ❑ **Boots**
- ❑ **One Gallon Bucket**
- ❑ **One Pint Container**
- ❑ **Lab Bottles**
- ❑ **Clipboard**

Key Observations:

- Presence of Flow
- Odors
- Colors/Clarity
- Stains/Deposits on the bottom of the stormwater structure
- Oil Sheen, scum or foam on standing water

Know the Difference??



Iron Bacteria

Diesel Fuel

Water Quality Test Parameters and Uses

Water Quality Test	Use of Water Quality Test
1. Conductivity	Indicator of dissolved solids
2. Bacteria (Fecal coliform, *E. Coli*)	Indicates presence of sanitary wastewater
3. Ammonia	May indicate presence of sanitary wastewater
4. Surfactants	Indicates presence of detergents (laundry and car washing)
5. pH	May indicate commercial or industrial discharge
6. Temperature	May indicate industrial cooling/sanitary wastewater
7. Phosphate	High levels indicate presence of sewage and fertilizers
8. Nitrate	May indicate presence of fertilizers
9. Dissolved Oxygen	Low levels may indicate presence of sewage
10. Hardness	Distinguishes between treated and untreated water
11. Total Chlorine	Indicator of inflow from potable water source
12. Fluoride	Indicator of inflow from potable water source
13. Potassium	High levels may indicate presence of sanitary wastewater
14. Optical Brighteners	Indicates presence of laundry detergents
15. Salinity	May indicate commercial or industrial discharge

Outfall Material:

High Density Polyethylene (HDPE)

Vitrified Clay Pipe (VCP)

Corrugated Metal Pipe (CMP)

Reinforced Concrete Pipe (RCP)

Polyvinyl Chloride (PVC)

Ductile Iron Pipe (DIP)

Field Strategies for Detecting Illicit Discharge

1. Detection Tools

Detecting and eliminating illicit discharges is a required task under Ohio EPA's Phase II storm water permit, and also an important part of protecting water quality.

To do this, field personnel first must be able to identify illicit discharges using multiple physical and sensory characteristics described below. Once a person has identified an apparent illicit discharge, he or she can record the information on the Illicit Discharge Detection Form (Attachment 1), and forward the information to the Storm Water District.

Note that illicit discharges are best detected during dry weather conditions. During and after a rain, any illicit discharges that may be present will likely be masked by other pollutants being carried by storm water runoff.

Illicit Discharge Detection Form

A useful tool has been created for documenting and classifying illicit discharge in the field: the Illicit Discharge Detection Form (IDDF). The concept of the IDDF is to establish a record of the intensity of the discharge, the present indicators at the time of detection, and the exact location of the discharge site. The form requires specific physical observations so that the discharge can be identified and evaluated properly.

There are four main descriptive components used to classify an illicit discharge: odor, color, turbidity, and floatables. The intensity of each sensory indicator can be measured using the "severity scale" portion of the IDDF. This scale gauges the severity of the offense by assigning a 1, 2, or 3 (1 being the least offensive, 3 being the most).

This form can be used for Dry Weather Screening of the Outfalls as well as for general Illicit Discharge Detection.

TIP: It is also very helpful to capture the existing conditions of the discharge on camera when first detected (record date!) so that any change in condition can be verified upon further monitoring of the site. A digital photograph of the discharge is the most helpful.

2. Identification of Illicit Discharge

Sensory Indicators

Each illicit discharge possesses a distinct group of physical characteristics. Based on these distinctions, unique sensory observations can be made that point to a specific source or generating site so that the illicit discharge can be addressed. *Sensory indicators* are observations that can be made using smell and/or sight, and require no measurement equipment initially. There are seven indicators that can predict an illicit discharge: *flow*, *odor*, *color*, *turbidity*, *floatables*, *deposits/stains* and *vegetation*. Although only a preliminary observation of a suspected illegal discharge, *sensory indicators* can be documented, sampled, and utilized for further study and ultimately the elimination of illicit discharges. Here are some ordinary sensory indications of an illicit discharge:

- Flow during dry weather
- Unusual color or cloudiness
- Strong odors
- Floating debris
- Surface scum or foam
- Oil sheen
- Dead vegetation or inhibited growth
- Stains on channel bottom, sides or rocks
- Pipe corrosion
- Algae

Any of the *sensory indicators* can leave physical traces of an illicit discharge, whether it is a continuous, intermittent, or one-time event. Physical indication of *past* illicit discharge can be outfall damage, deposits or stains, uncharacteristic vegetative growth on or around the outfall, or scour which signifies intermittent or past transitory discharge.

Flow

Flow coming from storm water pipes during extended periods of dry weather may be an indication of an illicit discharge. The presence of such flow should be noted on the Illicit Discharge Detection Form.

Odor

Before taking any steps in determining an illicit discharge due to *odor*, the field crew must unanimously establish where the odor is coming from. In some situations the source of the odor can be misleading; it may actually be shrubs, trash, carrion or animal waste. If the crew decides (after further inspection) that the outlet pipe is indeed the source of the odor, the intensity can be applied to a scale of *odor* severity (the IDDF). A value of one indicates that the odor is faint and barely detectable by the crew. A "two" signifies a moderate odor emanating from the outlet pipe. If a "three," the odor is unbearable and can be sensed from some distance away. A sample of the stream can be taken as close to the source as possible even though there may not be another sensory indicator present. If samples are collected, follow laboratory procedures for proper collection and distribution.

Color

C*olor* refers to the tinge of the discharge which can be categorized as clear, slightly tinted, or intense on the IDDF. When chemical discharges are present, the entire spectrum of colors is potentially visible: green, red, yellow, blue, white, and even brown or orange are possible (Figure 1). A rainbow sheen floating on the water surface may indicate a petroleum-based discharge (see *floatables*). If it can be discerned that the cause of the color is not natural, the physical characteristics should be recorded, and if possible, a sample should be taken. The sample should be captured in a clean, clear bottle and held up to the light so that an accurate judgment about its intensity and color can be made. Many times the source of the discharge can easily be traced by following the color plume upstream.

Figure 1 Indicator: color

Turbidity

Turbidity is a measure of the cloudiness of the water sampled at the discharge site (Figure 2). It is easy to confuse *turbidity* and *color*. The elemental difference is that turbidity is a measure of how easily the sample is penetrated by light, whereas color is a measure of the tint of the water. A turbid sample will contain a high concentration of suspended sediment whereas color will appear solid and may be clear or turbid (cloudy). Other sensory indicators can also be identified in the same sample with *turbidity*; such as *odor or floatables*.

A sample of the suspect illicit discharge may be collected in a clear bottle, much like *color*, where it can be scrutinized closely for suspended solids or other sensory indicators. Sometimes *turbidity* occurs in a scour or plunge pool underneath the outlet pipe. Often the origin of a discharge is not readily apparent, but can be traced by looking upstream for any *turbidity* plumes.

Figure 2 Indicator: turbidity

Floatables

This sensory indicator is a visual observation can usually be seen from a distance making it more noticeable than other indicators (Figure 3). Sewage, oil sheen, and suds are examples of *floatables*, while trash is generally not.

Figure 3 Indicator: floatables

Floatables can be ranked from 1 to 3 according to their mass. Different types of *floatables* (Table 1) have different characteristics associated with them. Sewage should automatically be ranked as "severe" and assigned a value of three because of the threat level to the health and well being of the stream and downstream inhabitants. Oil sheens that occur on the surface are ranked according to their thickness and coverage where small traces are assigned a "1" and larger sheens are assigned a 2 or 3 depending upon their thickness. The scale appears as:

□ Sewage (toilet paper,etc.)
□ Petroleum (oil sheen)
□ Suds
□ Other_____

Table 1 Floatable Identification

□ 1- Slight
□ 2- Some
□ 3- Massive/Severe

Table 2 Floatable Size Description

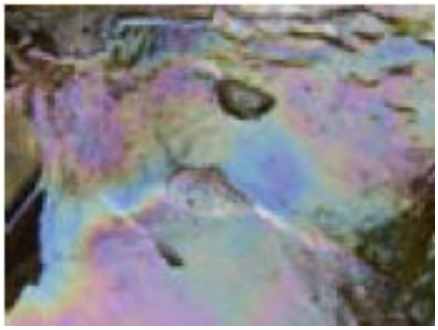


Figure 4 Severe oil sheen

Suds can be ranked according to their foaminess and staying power. Thick foam that floats several feet downstream before breaking apart is ranked a three because it possesses both staying power and thickness. Naturally occurring suds (Figure 5) will break up quickly and are generally clear or white.

Figure 5 Naturally-occurring suds

Deposits or Staining

There may be indications of past illicit discharges in the form of deposits and staining. Staining can occur at the base of the discharge pipe or on rocks below the outfall and may be a sign of persistent, intermittent discharges. Any deposits or stains should be marked on the IDDF as mineral, sediment, oily, grease or other. The color of the stain should also be noted.

Vegetation

Another sign of illicit discharges may be changes in vegetation. Some pollutants may kill vegetation around an outfall while others may promote excessive growth of algae or other vegetation. Changes in vegetation should be noted on the IDDF as none/dead, excessive, algae or other.

3. Filling out the Reporting Form

Once a suspected illicit discharge has been identified, the attached Illicit Discharge Detection Form (IDDF) should be filled out as completely as possible. Something should be recorded in all fields. The location should be identified as clearly as possible. If something does not apply, record "N/A." If something is observed in the field that is not listed on the IDDF, this should be recorded in the comments section. Once a form is completed, it should be faxed as soon as practical to the Storm Water District. If samples are collected, the sample report for the testing laboratory should be attached to the reporting form.

4. Reporting Spills and Illicit Discharges

If the incident is severe and immediately threatens public health or safety, call 911 and the Ohio EPA Spill Hotline listed to the right. Significant oil spills or rainbow sheens that indicate a petroleum spill should also be reported by calling 911.

If a sewage problem is suspected in an area that is served by public sewers, call the County County Sanitary Engineer at the number listed to the right. If the problem is suspected to be the result of a failing septic system, contact the Health District again at the number listed to the right.

For all discharges, including suspected sewage spills and emergency situations, the Illicit Discharge Detection Form should be completed and faxed to Community Development at 440.328.2349, attention Don Romancak. If a form is not available to fill out, call Don Romancak, Community Development Director, at 440.328.2322 to report the problem. Call this same number if there are any questions as to whether something is an illicit discharge.

Severe Cases/Emergency

Emergency Management Agency
911

Ohio EPA Spill Hotline
1-800-282-9378

County Sanitary Engineer
440.329.5586

Lorain County General Health District
440.322.6367

Lorain County Community Development
Ph: 440.328.2322
Fx: 440.328.2349

Illicit Discharge Detection Form

Date:	**Time:**	**Dry Weather Screening:** Yes___ No___	
Field Crew:		**Watershed:**	
Last Rainfall: □ Raining Now □ 0-3 Days □ > 3 Days □ Unknown		**Amount:** □ <0.1" □ >0.1"	
Outfall No:		**Location:**	
Source of Discharge (if known):			
Photograph Taken: Yes___ No___ #_____			
Sample Collected: Yes___ No___ #_____			

Indicator	CHECK if present	Description	Severity Scale
Dry Weather Flow	[__]	*Dry= No precip in past 72 hours*	N/A
Stream Flow	[__]	Flow Rate (if known)►	[_] 1-Low [_] 2-Normal [_] 3-High
Odor	[__]	[_] Sewage [_] Rotten eggs [_] Rancid/Sour [_] Petroleum/Gas [_] Fragrant [_} Other_____	[_] 1-Faint; barely detectable [_] 2-Moderate; easily detectable [_] 3-Unbearable; noticeable from a distance
Color	[__]	[_] Clear [_] Brown [_] Blue [_] Green [_] Gray [_] Black [_] White [_] Orange [_] Red [_] Yellow	[_] 1-Slightly tinted [_] 2-Moderately tinted [_] 3-Intense
Turbidity	[__]	See Severity Scale ►	[_] 1-Slight cloudiness [_] 2-Cloudy [_] 3-Opaque
Floatables (Does not include trash)	[__]	[_] Sewage (toilet paper,etc.) [_] Petroleum (oil sheen) [_] Suds [_] Other: _____	[_] 1-Slight [_] 2-Some [_] 3-Massive/Severe
Deposits/Stains	[__]	[_] None [_] Mineral [_] Sediment [_] Oil [_] Grease [_] Vegetation [_] Other _____	[_] 1-Slight [_] 2-Some [_] 3-Massive/Severe
Vegetation	[__]	[_] Normal [_] Algae [_] Dead [_] Excessive [_] Other _____	
Fish Kill	[__]	[_] Small <5 fish [_] Medium [_] Large [_] Other animals _____	

Other Observations:

Lorain County Storm Water District

Form Developed by Clarmont County (Revised and Used with Permission)

EXHIBIT 3 – Illicit Discharge Resolutions

LORAIN COUNTY

Board of Commissioners

Betty Blair Ted Kalo Lori Kokoski

County Administrator
James R. Cordes
440-329-5760

Assistant County Administrator
Ronald F. Twining
440-329-5530

Clerk of Board of Commissioners
Theresa Upton
440-329-5103

Animal Control Officer
J. A. Szlempa Sr.
440-326-5997

Budget Director
Lisa Hobart
440-329-5201

Charles Berry Bridge Supervisor
Charles Mackin
440-244-2137

Children & Family Council
Melissa Stefano
440-284-4467

Community Development Director
Rebecca Jones
440-328-2326

E-9-1-1 Director
Robin Jones
440-329-5444

Emergency Management & Homeland Security Director
Thomas Kelley
440-329-5117

Golden Acres Administrator
Jeri Dull
440-988-7210

Human Resources Department
440-329-5150

IT Director
Ernie Smith
440-329-5786

Lorain County Transit Director
Richard Enty
440-328-2490

Maintenance Director
Dennis Shawver
440-329-5326

Office on Aging Director
Patricia Littleton
440-329-4818

Office Services Supervisor
Jennifer Demich
440-329-5115

Office of Sustainability Director
Michael Challender
440-328-2361

Purchasing Director
Yvonne Newton
440-329-5240

Records Center Supervisor
Lynn Wallace-Smith
440-326-4866

Solid Waste Director
Dan Coleman
440-329-5442

Special Projects Manager
Karen Davis
440-329-5102

Workforce Development Director
Vivian Alexander
440-284-1830

June 23, 2010

Gerald A. Innes
Assistant LC Prosecutor
225 Court Street
Elyria, Ohio 44035

Dear Mr. Innes:

Enclosed is Resolution No. 10-417 adopted by the Lorain County Board of Commissioners on June 23, 2010 establishing methods for controlling the introduction of pollutants into the MS4 in order to comply with requirements of the National Pollutant Discharge Elimination System permit process as required by OHEPA.

This is being forwarded for your information and files.

Yours truly,

Theresa L. Upton
Clerk

Enclosure

Cc: File

226 Middle Ave. Elyria, Ohio 44035-5641 Phone: 440-329-5000 or 440-244-6261 Fax: 440-323-3357
www.loraincounty.us

LORAIN COUNTY

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Karen Davis
440-329-5102

Workforce Development Director
Vivian Alexander
440-284-1830

June 23, 2010

Gerald A. Innes
Assistant LC Prosecutor
225 Court Street
Elyria, Ohio 44035

Dear Mr. Innes:

Enclosed is Resolution No. 10-418 adopted by the Lorain County Board of Commissioners on June 23, 2010 approving and entering into MOU's with the Townships of Grafton, Eaton, Columbia, Carlisle, Elyria, Sheffield and Amherst pursuant to Clean Water Act, Ohio EPA Phase II Program designating entities to develop and implement a program to detect and eliminate illicit discharges.

This is being forwarded for your information, along with the executed documents for your distribution.

Yours truly,

Theresa L. Upton
Clerk

Enclosure

Cc: Melissa Betlejewski, Purchasing
Eaton Township
Grafton Township
Sheffield Township
File

226 Middle Ave. Elyria, Ohio 44035-5641 Phone: 440-329-5000 or 440-244-6261 Fax: 440-323-3357
www.loraincounty.us

B.12 RESOLUTION NO. 10-417

In the matter of establishing methods for)
controlling the introduction of pollutants) June 23, 2001
into the MS4 in order to comply with)
requirements of the National Pollutant)
Discharge Elimination System permit)
process as required by OHEPA)

WHEREAS, the Lorain County Board of Commissioners establishes methods for controlling the introduction of pollutants into the MS4 in order to comply with requirements of the National Pollutant Discharge Elimination System permit process as required by OHEPA; and

WHEREAS, this resolution is for illicit discharge and illegal connection control

I. PURPOSE AND SCOPE

The purpose of this regulation is to provide for the health, safety, and general welfare of the citizens of Lorain County, Ohio (County) through the regulation of illicit discharges to the municipal separate storm sewer system (MS4). This regulation establishes methods for controlling the introduction of pollutants into the MS4 in order to comply with requirements of the National Pollutant Discharge Elimination System (NPDES) permit process as required by the Ohio Environmental Protection Agency (Ohio EPA). The objectives of this regulation are:

A. To prohibit illicit discharges and illegal connections to the MS4.

B. To establish legal authority to carry out inspections, monitoring procedures, and enforcement actions necessary to ensure compliance with this regulation.

II. APPLICABILITY

This regulation shall apply to all residential, commercial, industrial, or institutional facilities responsible for discharges to the MS4 and on any lands in the County, except for those discharges generated by the activities excepted by state or federal law.

III. DEFINITIONS

The words and terms used in this regulation, unless otherwise expressly stated, shall have the following meaning:

A. Best Management Practices (BMPs): means schedules of activities, prohibitions of practices, general good house keeping practices, pollution prevention and educational practices, maintenance procedures, and other management practices to prevent or reduce the discharge of pollutants to storm water. BMPs also include treatment practices, operating procedures, and practices to control site runoff, spillage or leaks, sludge or water disposal, or drainage from raw materials' storage.

B. Environmental Protection Agency or United States Environmental Protection Agency (USEPA): means the United States Environmental Protection Agency, including but not limited to the Ohio Environmental Protection Agency (Ohio EOA), or any duly authorized official of said agency.

C. Floatable Material: in general this term means any foreign matter that may float or remain suspended in the water column, and includes but is not limited to, plastic, aluminum cans, wood products, bottles, and paper products.

D. Hazardous Material: means any material including any substance, waste, or combination thereof, which because of its quantity, concentration, or physical, chemical or infectious characteristics may cause, or significantly contribute to, a substantial present or potential hazard to human health, safety, property, or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

E. Illicit Discharge: as defined at 40 C.F.R. 122.26 (b)(2) means any discharge to an MS4 that is not composed entirely of storm water, except for those discharges to an MS4 pursuant to a NPDES permit or excepted by state or federal law.

F. Illegal Connection: means any drain or conveyance, whether on the surface or subsurface that allows an illicit discharge to enter the MS4.

G. Municipal Separate Storm Sewer System (MS4): as defined at 40 C.F.R. 122.26 (b)(8), municipal separate storm sewer means a conveyance or system of conveyances, (including roads with drainage systems, catch basins, curbs, gutters, ditches, man-made channels, or storm drains):

1. Owned or operated by a State, city, town, borough, county, parish, district, municipality, township, county, district, association, or other public body (created by or pursuant to State law) having jurisdiction over sewage, industrial wastes, including special districts under State law such as a sewer district, or similar entity, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under section 208 of the Clean Water Act that discharges to waters of the United States;
2. Designed or used for collecting or conveying storm water;
3. Which is not a combined sewer; and
4. Which is not part of a Public Owned Treatment Works (POTW) as defined at 40 C.F.R. 122.2.

H. National Pollutant Discharge Elimination System (NPDES) Storm Water Discharge Permit: means a permit issued by EPA (or by a State under authority delegated pursuant to 33 USC § 1342(b))that authorized the discharge of pollutants to waters of the United States, whether the permit is applicable on an individual, group, or general area-wide basis.

I. Off-Lot Discharging Home Sewage Treatment System: means a system designed to treat home sewage on-site and discharges treated wastewater effluent off the property into a storm water or surface water conveyance system.

J. Owner/Operator: means any individual, association, organization, partnership, firm, corporation or other entity recognized by law and acting as either the owner or on the owner's behalf.

K. Pollutant: means anything that causes or contributed to pollution. Pollutants may include but are not limited to, paints, varnishes, solvents, oil and other automotive fluids, non-hazardous liquid and solid wastes, yard wastes, refuse, rubbish, garbage, litter or other discarded or abandoned objects, floatable materials, pesticides, herbicides, fertilizers, hazardous materials, wastes, sewage, dissolved and particulate metals, animal wastes, residues that result from constructing a structure, and noxious or offensive matter of any kind.

L. Storm Water: any surface flow, runoff, and drainage consisting entirely of water from any form of natural precipitation, and resulting from such precipitation.

M. Wastewater: The spent water of a community. From the standpoint of a source, it may be a combination of the liquid and water carried wastes from residences, commercial buildings, industrial plants and institutions.

IV. DISCLAIMER OF LIABILITY

Compliance with the provisions of this regulation shall not relieve any person from responsibility for damage to any person otherwise imposed by law. The provisions of this regulation are promulgated to promote the health, safety, and welfare of the public and are not designed for the benefit of any individual or for the benefit of any particular parcel of property.

V. CONFLICTS, SEVERABILITY, NUISANCES & RESPONSIBILITY

A. Where this regulation is in conflict with other provisions of law, the most restrictive provisions, as determined by the County shall prevail.

B. If any clause, section, or provision of this regulation is declared invalid or unconstitutional by a court of competent jurisdiction, the validity of the remainder shall not be affected thereby.

C. This regulation shall not be construed as authorizing any person to maintain a nuisance on their property, and compliance with the provisions of this regulation shall not be a defense in any action to abate such a nuisance.

D. Failure of the County to observe or recognize hazardous or unsightly conditions or to recommend corrective measures shall not relieve the site owner from the responsibility for the condition or damage resulting therefrom, and shall not result in the County, its officers, employees, or agents being responsible for any condition or damage resulting therefrom.

VI. RESPONSIBILITY FOR ADMINISTRATION

The County shall administer, implement, and enforce the provisions of this regulation. The County may contract with the Board of Health to conduct inspections and monitoring and to assist with enforcement actions.

VII. DISCHARGE AND CONNECTION PROHIBITIONS

A. Prohibition of Illicit Discharges. No person shall discharge, or cause to be discharged, an illicit discharge into the MS4. The commencement, conduct, or continuance of any illicit discharge tot he MS4 is prohibited except as described below:

1. Water line flushing; landscape irrigation; diverted stream flows; rising ground waters; uncontaminated ground water infiltration; uncontaminated pumped ground water; discharges from potable water sources; foundation drains; air conditioning condensation; irrigation water; springs; water from crawl space pumps; footing drains; lawn watering; individual residential car washing; flows from riparian habitats and wetlands; dechlorinated swimming pool discharges; street wash water; and discharges or flows from fire fighting activities. These discharges are exempt until such time as they are determinated by the County to be significant contributors of pollutants to the MS4.
2. Discharges specified in writing by the County as being necessary to protect public health and safety.
3. Discharges from off-lot household sewage treatment systems permitted by the Board of Health for the purpose of discharging treated sewage effluent in accordance with Ohio Administrative Code 3701-29-02 (6) until such time as the Ohio Environmental Protection Agency issues a NPDES permitting mechanism for residential 1, 2 or 3 family dwellings. These discharges are exempt unless such discharges are deemed to be creating a public health nuisance by the Board of Health.

B. Prohibition of Illegal Connections. The construction, use, maintenance, or continued existence of illegal connections to the MS4 is prohibited.

1. This prohibition expressly includes, without limitation, illegal connections made in the past, regardless or whether the connection was permissible under law or practices applicable or prevailing at the time of connection.
2. A person is considered to be in violation of this regulation if the person connects a line conveying illicit discharges to the MS4, or allows such a connection to continue.

VIII. MONITORING OF ILLICIT DISCHARGES AND ILLEGAL CONNECTIONS

A. Establishment of an Illicit Discharge and Illegal Connection Monitoring Program: The County shall establish a program to detect and eliminate illicit discharges and illegal connections to the MS4. This program shall include the mapping of the MS4, the routine inspection of storm water outfalls to the MS4, and the systematic investigation of potential residential, commercial, industrial, and institutional facilities for the sources of any dry weather flows found as the result of these inspections.

B. Inspection of Residential, Commercial, Industrial or Institutional Facilities

1. The County shall make regular general inspections of the County to determine the existence of facilities noncompliant with this regulation.
2. On the basis of the general inspection the County shall pursue a cooperative effort to remedy any noncompliant conditions through one or more of the following steps.
   a. Enter and inspect the premises for further inspection as deemed necessary to determine compliance.
   b. Set up devices to conduct monitoring and/or sampling of the facility's storm water discharge.
   c. Require the facility owner/operator to install monitoring equipment as necessary, including sampling and monitoring equipment to be kept in operating condition by the owner and calibrated devices for measuring storm water flow.
   d. Provide for reasonable follow-up inspection by the County to determine adherence to the monitoring plan. A schedule will be developed whereby owner/operator will allow County safe and reasonable access to the premises for inspection. Owner/operator shall remove obstructions to such access.
3. If the County is refused access to any part of the facility/premises from which storm water is discharged, and the County demonstrates probable cause to believe these may be a violation of this regulation, or there is a need to inspect and/or sample to verify compliance with this, or to protect the public health, safety and welfare, the County may seek issuance of a search warrant, civil remedies including but not limited to injunctive relief, and/or criminal remedies from any court of appropriate jurisdiction.

IX. ENFORCEMENT

A. Notice of violation. When the County finds that a person has violated a prohibition or failed to meet a requirement of this regulation, the County may order compliance by written Notice of Violation. Such notice must specify the violation and shall be hand delivered, and/or sent by registered mail, to the owner/operator of the facility. Such notice may require the following actions:

1. The performance of monitoring, analyses, and reporting;
2. The elimination of illicit discharges or illegal connections;
3. That violating discharges, practices, or operations cease and desist;
4. The abatement or remediation of storm water pollution or contamination hazards and the restoration of any affected property; or
5. The implementation of source control or treatment BMPs.

B. If abatement of a violation and/or restoration of affected property is required, the Notice of Violation shall set forth a deadline within which such remediation or restoration must be completed. Said Notice shall further advise that, should the facility owner/operator fail to remediate or restore within the established deadline, a legal action for enforcement may be initiated.

C. Any person receiving a Notice of Violation must meet compliance standards within the time established in the Notice of Violation.

D. Administrative Hearing: If the violation has not been corrected pursuant to the requirements set forth in the Notice of Violation, the County shall schedule an administrative hearing to determine reasons for non-compliance and to determine the next enforcement activity. Notice of the administrative hearing shall be hand delivered and/or sent registered mail.

E. Administrative hearings shall be conducted by the Board of Commissioners, or by any officer or body designated by the Board of Commissioners by further resolution.

F. Injunctive Relief: It shall be unlawful for any owner/operator to violate any provision or fail to comply with any of the requirements of this regulation pursuant to O.R.C. 3709.211. If an owner/operator has violated or continues to violate the provisions of this regulation, the County may petition for a preliminary or permanent injunction restraining the owner/operator from activities that would create further violations or compelling the owner/operator to perform abatement or remediation of the violation.

X. REMEDIES NOT EXCLUSIVE

The remedies listed in this regulation are not exclusive of any other remedies available under any applicable federal, state or local law and it is in the discretion of the County to seek cumulative remedies.

Motion by Kalo, seconded by Kokoski to adopt Resolution. Ayes: Kalo & Kokoski / Absent: Blair had an appointment.

Motion carried. _____(discussion was held on the above)

I, Theresa L. Upton, Clerk to the Lorain County Board of Commissioners do hereby certify that the above Resolution No. 10-417 is a true copy as it appears in Journal No. 10 on date of June 23, 2010.

Theresa L. Upton, Clerk

A.13 RESOLUTION NO. 10-418

In the matter of approving and entering into MOU's with the Townships of Grafton, Eaton, Columbia, Carlisle, Elyria, Sheffield and Amherst pursuant to Clean Water Act, Ohio EPA Phase II Program designating entities to develop and implement a program to detect and eliminate illicit discharges

June 23, 2010

BE IT RESOLVED, by the Lorain County Board of Commissioners that we hereby approve & enter into MOU's with the Townships of Grafton, Eaton, Columbia, Carlisle, Elyria, Sheffield and Amherst pursuant to Clean Water Act, Ohio EPA Phase II Program designating entities to develop and implement a program to detect and eliminate illicit discharges.

Said MOU's are considered a part hereof to this resolution by as follows and can be found on file in the Commissioners/Purchasing/Township Office;

This Agreement entered into by and between the Board of Commissioners of Lorain County, Ohio (COUNTY) and the Board of Trustees of Township (TOWNSHIP)

WHEREAS, pursuant to the Clean Water Act, Ohio EPA Phase II program requires Phase II designated entities to develop and implement a program to detect and eliminate illicit discharges; and

WHEREAS, the COUNTY and TOWNSHIP DESIRE TO COLLABORATE EFFORTS TO COMPLY WITH Phase II requirements.

THEREFORE, IN CONSIDERATION OF the mutual covenants herein contained, the parties hereto agree as follows:

1.0 PLEDGE OF COOPERATION

Understanding that the current economic conditions severely restrict the funding and other resources available to local government, the parties hereto desire to collaborate their efforts to comply with Phase II mandates regarding the regulation if illicit discharge so as to use funding so as to avoid duplication and be economically efficient.

COUNTY agrees to dedicate its personnel and departments to assist and work in conjunction with the TOWNSHIP to fulfill the goals set forth hereafter. This will include the office so he Lorain County Engineer, Lorain County Auditor, Lorain County Health Department, Lorain County Community Development, Lorain County Soil & Water, Lorain County Emergency management and Lorain County Prosecuting Attorney.

TOWNSHIP agrees to dedicate its personnel and departments to assist and work in conjunction with the COUNTY to fulfill the goals set for hereafter. This will include the Township Zoning Inspector and Zoning boards, the Road Superintendent and Road Department, and all other administrative staff.

2.0 DETECTION AND ELIMINATION OF ELICIT DISCHARGES

COUNTY and TOWNSHIP shall use their best efforts, to the extent permitted by available funding, to achieve the detection and elimination of elicit discharges by implementing the following programs.

2.1 Conduct public education on illicit discharges
Employees, businesses and the general public will be informed of the hazards associated with illicit discharges and the improper disposal of waste. This will be accomplished through public programs and distribution literature. The County Soil & Water is currently accomplishing this through its PIPE program, and video the County Health Department has produced and broadcasts videos. The TOWNSHIP circulates information through newsletters and postings at Township buildings.

2.2 Enactment of illicit discharge regulations
COUNTY and TONWSHIP are in the process of and will forthwith enact regulations prohibiting illicit discharges in their respective jurisdictions.

2.3 Detection of illicit discharges
COUNTY and TOWNSHP are currently identifying illicit discharge locations. The County Health Department is identifying home sewage treatment systems. TOWNSHIP road personnel and administrative staff are locating outfalls. The information gathered will be submitted to the Lorain County Engineer and Auditor to prepare a map of the MS4 system.
The parties will strive to update the map annually with the objective of identifying by 2014, all storm sewers, ditches, catch basins, publicly owned storm water management structures and all privately owned post construction BMP's installed since April 21, 2003.

2.4 Inspection of
COUNTY and TOWNSHIP will cooperate in field surveys and inspections of outfalls and home sewage systems for detection of illicit discharges. Documentation and repots regarding the inspections will be shared with each other, as well as OHIO EPA. Dry weather screening of all outfalls is to occur by 2014.
Upon location of an illicit discharge, steps will be taken in accordance with the local regulations adopted pursuant to Section 2.2, to eliminate the illicit discharge by the owner.

2.5 Enforcement
In the event voluntary remediation by the owner is not accomplished in a timely manner, referral will be made to the Lorain County Prosecuting Attorney. The Prosecuting Attorney shall proceed with all remedies allowable by law including civil injunction and/or criminal prosecution necessary to obtain compliance with the Clean Water Act.

2.6 Best Management Practices
COUNTY and TOWNSHIP shall implement Best Management Practices to avoid illicit discharges. This will include training and instruction to public employees, information to the general public, monitoring of private home sewage systems and implementation of reasonable protection from accidental discharge, including establishing measurable goals, when illicit discharges are detected.

3.0 TERMINATION

This Agreement may be terminated by either party upon sixty (60) day written notice to the other party.

S/BOARD OF COMMISSIONER OF LORAIN COUNTY

S/BOARD OF TOWNSHP TRUSTEES

S/APPROVED AS TO FORM; Gerald A. Innes, Assistant County Prosecutor

Motion by Kalo, seconded by Kokoski to adopt Resolution. Ayes: Kalo & Kokoski / Absent: Blair had an appointment.

Motion carried. _____(discussion was held on the above)

I, Theresa L. Upton, Clerk to the Lorain County Board of Commissioners do hereby certify that the above Resolution No. 10-418 is a true copy as it appears in Journal No. 10 on date of June 23, 2010.

Theresa L. Upton, Clerk

EXHIBIT 4 – Illicit Discharge Detection and Tracking Guide (CWP)

Table of Contents

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ATTACHMENT A: ORI Form……p. 25

ATTACHMENT B: Mapping the System……p. 27

ATTACHMENT C: Outfall Reconnaissance Inventory/ Sample Collection Lab Sheet……p. 29

Introduction to Illicit Discharge Detection & Elimination (IDDE)

An illicit discharge is "Any discharge to a municipal separate storm sewer that is not composed entirely of storm water, except discharges pursuant to a National Pollutant Discharge Elimination System (NPDES) permit and discharges resulting from fire-fighting activities." (NOTE: there are several types of NPDES permits and their intent is to authorize discharges provided permit requirements, such as effluent limits, are being met.)

These are two categories of illicit discharges, as follows:

- TRANSIENT – Short in duration, lasting only a short time and then disappearing.
    - Examples of *Direct* transient illicit discharges include:
        - A straight pipe from an unpermitted industrial facility that discharges washwater or process water; and
        - A floor drain that is connected to the storm sewer.
    - Examples of *Indirect* transient illicit discharges include:
        - Materials that have been dumped into a storm drain inlet or catch basin (Figure 1),
        - An old or damaged sanitary sewer line that is leaking fluids into groundwater that then seeps into a storm sewer line or drainage way, and
        - A failing septic system that is leaking into a cracked storm sewer line.
- CONTINUOUS – Continuing without changing, stopping, or being interrupted. Examples include:
    - Sanitary wastewater piping that is cross-connected from a building or sanitary sewer line to the storm sewer,
    - A broken sanitary line (Figure 2), and
    - An industrial operational discharge that doesn't meet permit requirements.

Illicit discharges are considered "illicit" because storm sewer systems, unlike sanitary sewer systems, are not designed to accept, treat, or discharge non-storm water wastes.

Figure 1. Indirect, transient discharge: concrete slurry discharges from storm drain outfall to stream.

Figure 2. Direct, continuous discharge: broken sanitary line.

Federal requirements

Established in 1972 and amended in 1977 and 1987, the Clean Water Act (CWA) is the primary federal law governing water pollution. The Act requires states to set clean water standards to protect uses such as swimming, fishing, and drinking, and for the regulation of pollution discharges. The CWA initially focused on addressing water quality issues caused by point sources of pollution (e.g., wastewater treatment plants and industry) by making it unlawful to discharge any pollutant into navigable waters, unless a permit was obtained under its provisions. These permits, known as National Pollutant Discharge Elimination System (NPDES) permits, prevent the degradation of water quality by limiting pollution discharges to what can be safely assimilated by the environment. In 1987, the CWA was expanded to include non-point sources of urban pollution by requiring municipalities with separate storm sewer systems (referred to as "MS4s") to be permitted. Phase I of these permits, issued in 1990, requires medium and large cities or certain counties with populations of 100,000 or more to obtain NPDES permit coverage for their stormwater discharges. Phase II, issued in 1999, requires regulated small MS4s in urbanized areas, as well as small MS4s outside the urbanized areas that are designated by the permitting authority, to obtain NPDES permit coverage for their stormwater discharges. Generally, Phase I MS4s are covered by individual permits and Phase II MS4s are covered by a general permit. Each regulated MS4 is required to develop and implement a stormwater management program to reduce the contamination of stormwater runoff and prohibit illicit discharges.

What is required?

Recognizing the adverse effects illicit discharges can have on receiving waters, the Phase II Final Rule requires an operator of a regulated small MS4 to develop, implement and enforce an illicit discharge detection and elimination (IDDE) program, which is one of six minimum measures required under the Phase II stormwater program. The IDDE program must include the following:

- A storm sewer system map, showing the location of all outfalls and the names and location of all waters of the United States that receive discharges from those outfalls;
- Through an ordinance, or other regulatory mechanism, a prohibition (to the extent allowable under State, Tribal, or local law) on illicit discharges into the MS4, and appropriate enforcement procedures and actions;
- A plan to detect and address illicit discharges, including illegal dumping, into the MS4;
- The education of public employees, businesses, and the general public about the hazards associated with illegal discharges and improper disposal of waste; and
- The determination of appropriate best management practices (BMPs) and measurable goals for this minimum control measure.

This document provides guidance on procedures for detecting and tracking illicit discharges through a desktop assessment of illicit discharge potential, field screening of outfalls to detect illicit discharges and drainage area investigations to locate and remove the source of the discharge.

For more information…

- EPA's Best Management Practices (BMPs) and Resources for IDDE: http://cfpub.epa.gov/npdes/stormwater/menuofbmps/index.cfm?action=min_measure&min_measure_id=3
- Brown, E., Caraco, D., and Pitt, R. 2004. *Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessment*. Center for Watershed Protection and University of Alabama. EPA X-82907801-0.U.S. EPA Office of Wastewater Management, Washington, D.C. Available at: http://cfpub.epa.gov/npdes/docs.cfm?program_id=6&view=allprog&sort=name#iddemanual

Illicit Discharge Detection and Tracking Procedures

Overview

This document outlines a common framework through which communities can develop a comprehensive plan to identify and eliminate dry weather illicit discharges to their separate storm sewer systems. The primary steps to identify illicit discharges and track their sources include: 1) conduct a desktop assessment of illicit discharge potential to identify priority locations for screening, 2) conduct field screening of outfalls in priority subwatersheds, and 3) conduct drainage area and storm drain investigations to identify the source(s) of all confirmed illicit discharges. Protocols for each step are described below. Further detail is provided in Brown et al. (2004).

Desktop assessment of illicit discharge potential

A desktop assessment of illicit discharge potential (IDP) uses mapping and other available data to determine the potential severity of illicit discharges within a community, and identifies which subwatersheds or generating land uses merit priority investigation. This assessment, recommended by Brown et al. (2004) provides insight on how to narrow your illicit discharge search, and is helpful when designing a discharge tracking system to best suit your needs. The desktop assessment draws on existing background data and anecdotal information to initially characterize IDP at the subwatershed level. Subwatersheds are then screened based on their composite score, and are designated as having a low, medium or high risk:

- Low – no known illicit discharge problems in the subwatershed.
- Medium– problems are confined to a few stream reaches, outfalls or specific generating sites in the subwatershed.
- High – Problems are suspected to be severe throughout the subwatershed.

The recommended scale for desktop assessments is the subwatershed or sewershed, which typically range from two to 10 square miles in area. Next, mapping, monitoring and other data are analyzed to identify subwatersheds with the greatest potential to contribute illicit discharges. The analysis can encompass up to 10 different screening factors. The desktop assessment consists of five basic steps:

Step 1: Delineate subwatersheds – This step may already be completed. If not, hydrologic, infrastructure and topographic map layers are needed to delineate the boundaries. Guidance on the techniques for accurately delineating subwatershed boundaries can be found in United States Geological Survey 2009 Federal Guidelines, Requirements, and Procedures for the National Watershed Boundary Dataset: ftp://ftp-fc.sc.egov.usda.gov/NCGC/products/watershed/hu-standards.pdf. The use of digital elevation models (DEMs) and GIS can also make subwatershed delineation an easier and faster, automated process.

Step 2: Compile mapping layers and subwatershed data – This step is best accomplished with the use of Geographic Information System (GIS). If GIS is not available, consider the use of Google Maps or other free mapping software. A list of suggested data can be found in Table 1 (from Brown et al. 2004).

Table 1: Useful Data for the Desktop Assessment of Illicit Discharge Potential

	Data	Likely Format
Recommended	Aerial photos or orthophotos	Digital map
	Subwatershed or catchment boundaries	Digital or hardcopy map
	Hydrology including piped streams	Digital or hardcopy map
	Land use or zoning	Digital or hardcopy map
	NPDES storm water permittees	Digital data or map
	Outfalls	Digital or hardcopy map
	Sewer system, 1" = 200' scale or better	Digital or hardcopy map
	Standard Industrial Classification codes for all industries	Digital or hardcopy data
	Storm drain system, 1" = 200' scale or better	Digital or hardcopy map
	Street map or equivalent GIS layers	Digital or hardcopy map
	Topography (5 foot contours or better)	Digital or hardcopy map
Optional	Age of development	Narrative data
	As-builts or construction drawings	Hardcopy map
	Condition of infrastructure	Narrative data
	Field inspection records	Hardcopy or digital data
	Depth to water table and groundwater quality	Digital data or maps
	Historical industrial uses or landfills	Narrative data or hardcopy map
	Known locations of illicit discharges (current and past)	Narrative data or digital map
	Outfall and stream monitoring data	Digital data
	Parcel boundaries	Digital or hardcopy map
	Pollution complaints	Narrative data
	Pre-development hydrology	Narrative data or hardcopy map
	Sanitary sewer Infiltration and Inflow (I/I) surveys	Hardcopy or digital data
	Septic tank locations or area served by septic systems	Hardcopy or digital map
	Sewer system evaluation surveys	Hardcopy or digital data
	Thermal imaging data	Digital data

Step 3: Compute discharge screening factors – Potential discharge screening factors are illustrated in Table 2.

Step 4: Screen for illicit discharge potential at the subwatershed and community level - Select the group of screening factors that apply most to your community, and assign them a relative weight. Next, points are assigned for each subwatershed based on defined scoring criteria for each screening factor. The total subwatershed score for all of the screening factors is then used to designate whether it has a low, medium or high risk to produce illicit discharges (Figure 3).

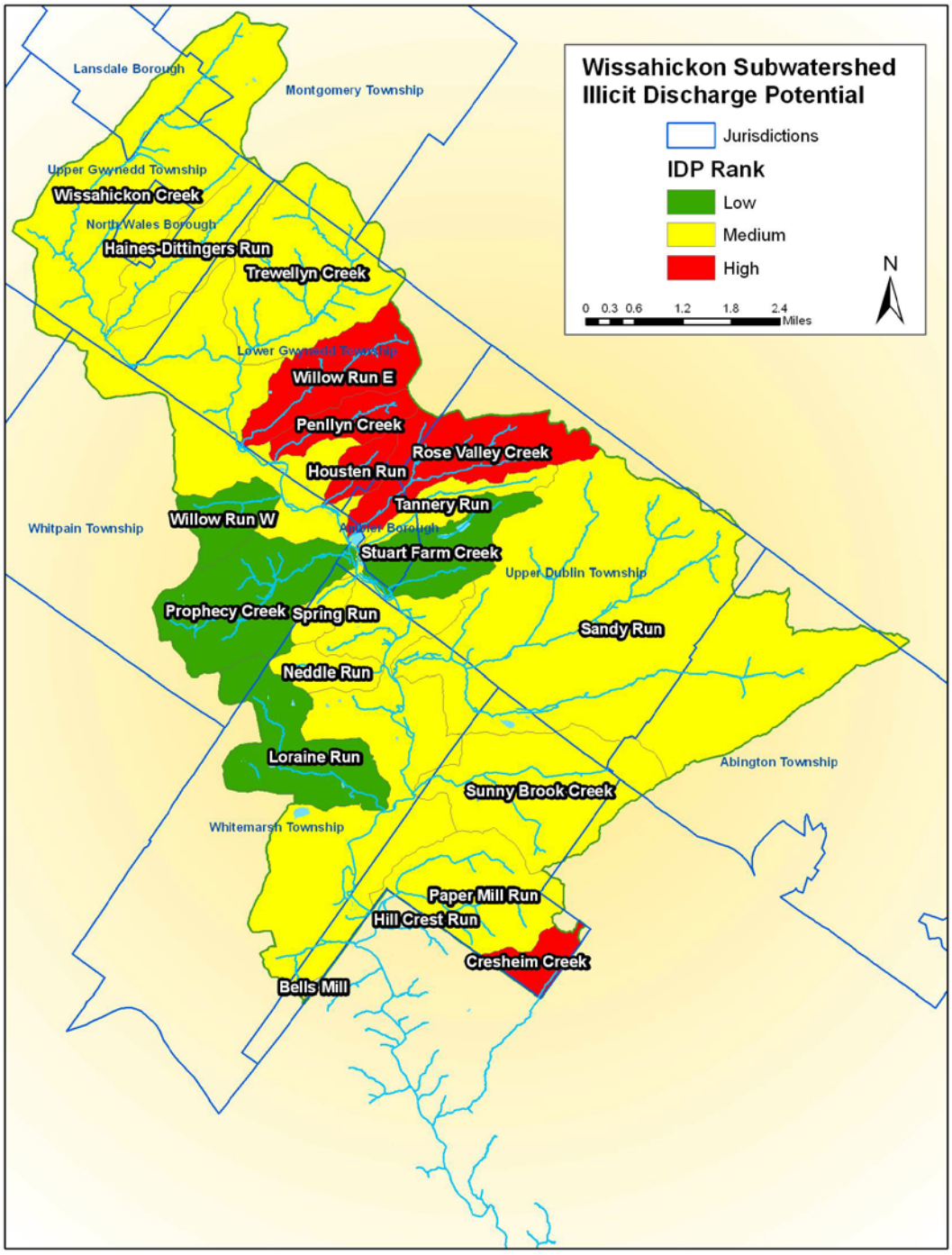

Figure 3. Illicit discharge potential analysis of the Wissahickon watershed in southeastern Pennsylvania.

Table 2: Defining Discharge Screening Factors in a Community	
Discharge Screening Factors	**Defining and Deriving the Factor**
1. Past Discharge Complaints and Reports	Frequency of past discharge complaints, hotline reports, and spill responses per subwatershed. Any subwatershed with a history of discharge complaints should automatically be designated as having high IDP.
2. Poor Dry Weather Water Quality	Frequency that *individual* samples of dry weather water quality exceed benchmark values for bacteria, nutrients, conductivity or other predetermined indicators. High risk if two or more exceedances are found in any given year.
3. Density of Generating Sites or Industrial NPDES Storm Water Permits	Density of more than 10 generating sites or five industrial NPDES storm water sites per square mile indicates high IDP. Density determined by screening business or permit databases.
4. Storm Water Outfall Density	Density of mapped storm water outfalls in the subwatershed, expressed as the average number per stream or channel mile. A density of more than 20 outfalls per stream mile indicates high IDP.
5. Age of Subwatershed Development	Defined as the average age of the majority of development in a subwatershed. High IDP is often indicated for developments older than 50 years. Determined from tax maps and parcel data, or from other known information about neighborhoods.
6. Sewer Conversion	Subwatersheds that had septic systems but have been connected to the sanitary sewer system in the last 30 years have high IDP.
7. Historic Combined Sewer Systems	Subwatersheds that were once served by combined sewer system but were subsequently separated have a high IDP.
8. Presence of Older Industrial Operations	Subwatersheds with more than 5% of its area in industrial sites that are more than 40 years old are considered to have high IDP. Determined from historic zoning, tax maps, and “old-timers.”
9. Aging or Failing Sewer Infrastructure	Defined as the age and condition of the subwatershed sewer network. High IDP is indicated when the sewer age exceeds design life of its construction materials (e.g., 50 years) or when clusters of pipe breaks, spills, overflows or I/I are reported by sewer authorities.
10. Density of Aging Septic Systems	Subwatersheds with a density of more than 100 older drain fields per square mile are considered to have high IDP. Determined from analysis of lot size outside of sewer service boundaries.

Table 2: Defining Discharge Screening Factors in a Community	
Discharge Screening Factors	**Defining and Deriving the Factor**
11. Thermal Anomalies	Thermal imaging data records images of heat radiating from the Earth's surface by aircraft equipped with an infrared video camera, which is similar to the technology used in night vision aids. Ground and stream surfaces tend to have fairly constant temperatures, so lighter (warmer) areas are readily identified as "thermal anomalies. Some of these anomalies may represent problems with the sewer system or sources of water pollution, but others may be caused by natural conditions, such as groundwater discharge. Subwatersheds with thermal anomalies can be considered to have higher IDP than those without them.

Step 5: Generate maps to support field investigations - Create relatively simple maps that show streams, channels, streets, landmarks, property boundaries and known outfall locations. Provide enough information so crews can find their way in the field without getting lost, but otherwise keep them uncluttered. Low altitude aerial photos are also a handy resource when available.

Consult Brown et al. (2004) for more detail on the desktop assessment.

Field screening of outfalls

Illicit discharges can be detected in several ways: citizen complaints, during regular outfall screening and during other routine activities conducted by staff. This section describes a protocol to be used during regular outfall screening, although sampling procedures to be followed at the outfall do not differ greatly based on the type of detection. Adapted from Brown et al. (2004), the protocol relies primarily on visual observations and the use of field test kits and portable instrumentation during dry weather to complete a thorough inspection of the communities' storm sewers in a prioritized manner. The protocol is applicable to most typical storm sewer systems; however, modifications to materials and methods may be required to address situations such as open channels, piped stream networks, systems impacted by sanitary sewer overflows, or situations where groundwater, backwater or tidal conditions preclude or confound adequate inspection. The primary focus of the protocol is sanitary waste, however, toxic and nuisance discharges may also be identified. Implementation of the protocol would satisfy the relevant conditions under Minimum Control Measure No. 3, illicit discharge detection & elimination (IDDE), of a community's NPDES MS4 Permit.

Rapid field screening of stormwater outfalls in priority subwatersheds is conducted during dry weather to identify potential illicit discharges (i.e., flowing outfalls) and is followed by indicator monitoring to characterize flow types to aid in finding sources. Table 3 lists the common indicator parameters used to detect illicit discharges. The field screening can also be used to develop a systematic outfall inventory and map of the MS4. Regular inspections of outfalls are a primary part of an effective IDDE program and

a regular schedule of long-term inspections for outfalls should be maintained. At a minimum, all outfalls should be inspected during the first NPDES permit cycle by walking entire stream reaches. Further inspections should be conducted during subsequent permit cycles.

Table 3. Recommended Indicator Parameters Used to Detect Illicit Discharges

Parameter	Discharge Types it can Detect				Laboratory/Analytical Challenges
	Sewage	Washwater	Tap Water	Industrial or Commercial Liquid Wastes	
Ammonia	●	◉	○	◉	Can change into other nitrogen forms as flow travels to the outfall
Detergents – Surfactants	●	●	○	◉	Reagent is a hazardous waste
E. coli, Enterococci, or Total Coliform	◉	○	○	○	24-hour wait for results
Fluoride*	○	○	●	◉	Exception for communities that do not fluoridate their tap water
Potassium	◉	○	○	●	

● Can almost always (>80% of samples) distinguish this discharge from clean flow types (e.g., tap water or natural water). For tap water, can distinguish from natural water.

◉ Can sometimes (>50% of samples) distinguish this discharge from clean flow types depending on regional characteristics, or can be helpful in combination with another parameter

○ Poor indicator. Cannot reliably detect illicit discharges, or cannot detect tap water

Data sources: Brown et al. (2004)

*Fluoride is a poor indicator when used as a single parameter, but when combined with additional parameters (such as detergents, ammonia and potassium), it can almost always distinguish between sewage and washwater.

Field Preparation

While a complete overview of field preparation for outfall screening can be found in Brown et al. (2004), some basic checklists for field preparation are provided below for convenience.

When to conduct an outfall survey?

- During the dry season (in regions with a clearly defined dry season)
- Late Fall/Early Spring- outfalls are easiest to spot during leaf-off conditions (especially in the southeast where excessive vegetation can limit access to outfalls); however, if part of the IDDE work is investigating swimming pool discharges it may require field work outside of the leaf-off time frame.
- After a dry period of **at least 48 hours** (trace rainfall activity may be acceptable depending on the size of the watershed).
- Early Morning/Late Afternoon- though not always possible, checking outfalls when people are home may increase the chances of catching an illicit connection.
- Avoid conditions during snow melt and/or if salt has been applied to the road system draining to the outfalls. Also note that some field tests (e.g. ammonia, chlorine) are affected by cold temperatures or confounded by the presence of salt (detergents).
- If outfall monitoring is occurring along a tidal body of water, data collection dates and times should be selected to take advantage of the lowest possible tide, this will allow for the easiest, safest and most accurate and complete assessment of outfalls.

The first step to successful field work is to have a map with the necessary information. Some data can be considered extremely helpful, but optional, while other data is required (Table 4). Maps should be provided in the field binders on 8.5 X 11 paper at a scale ranging from 1:1000 to 1:10000 (Figure 4).

Table 4: Map Preparation

Desired Data Layers	*Optional Data Layers*
Roads	Aerial Photography
Streams	Sewer infrastructure
Watershed Boundaries	Critical/ Resource Protection Areas
Outfall locations	Land Cover
Manhole Locations	Topography
Stormwater infrastructure	Current / former combined sewer pipes/outfalls
Jurisdictional Boundaries	

Figure 4. Example field map at 1:6,000 scale.

A field and lab supply list is provided in Table 5.

Table 5: Suggested Supply List	
Field	***Lab***
Field Binder with maps	Detergent test kits
Camera	Fluoride meter + reagents
GPS Unit	Potassium meter + standards
Measuring tape	Bacteria plates
Outfall marker	Incubator
Field Tape (50' min)	Sterile 1-ml pipettes
Stopwatch	Alconox or other cleaning solution
Ping-pong ball	Deionized water
Flashlight	Stopwatch
Graduated milk jug (marked at 1 L)	Gloves
Gloves	Filter

Table 5: Suggested Supply List	
Field	***Lab***
Dipper and/or telescoping rod	Filter paper
Pencils/Pens	Material Data Safety Sheets
Sharpies	
First Aid Kit	
Deionized Water	
Sterile sample bottles*	
Cooler and ice packs	
Nalgene bottles*	
Ammonia meter + reagents	
Chemwipes	
Ziploc Bags	
Waders	
*1 bottle each/site plus extra for duplicates	

A checklist of items to include in the Field Binders is provided below:

- ☐ Contact Numbers for Field Crews (i.e. cell phone number)
- ☐ Meeting Location/Address
- ☐ Safety Procedures and Emergency Numbers
- ☐ Location of Nearest Hospital
- ☐ Field Maps
- ☐ Chain-of Custody Form
- ☐ Outfall Reconnaissance Inventory Forms (see Appendix A)

Preparation of supplies should include the following:

☐ Ensure batteries in cameras, GPS units, meters, etc. are charged.

☐ Ensure all sample bottles are cleaned with Alcanox or similar cleaning product.

☐ Remove old labels from sample bottles and replace with new labels, if necessary.

☐ Ensure you have one bottle for each anticipated outfall as well as extra bottles for randomly selected replicates, if needed.

☐ Freeze all ice packs.

☐ Set temperature of incubator to that specified by manufacturer for bacterium of interest.

Outfall screening procedures

The primary field screening tool is the Outfall Reconnaissance Inventory (ORI) form, which is provided in Appendix A and described fully in Brown et al. (2004). The basic procedure at each outfall is to take a picture of the outfall and, if the outfall is not already in the jurisdiction's mapping system, collect GPS coordinates and label the outfall with spray paint or waterproof marking stick in a prominent location such as the outfall headwall (see Appendix B for more information on mapping a stormwater drainage system). Next, an ORI form is completed, which includes recording a description of the outfall (e.g., pipe material, diameter), a description of physical indicators of potential illicit discharges for both flowing and non-flowing outfalls and the results of flow and water quality measurements taken at flowing outfalls. A description of the flow measurement and sampling procedures is provided below.

If the outfall has dry weather flow, three samples should be collected: one for on-site analysis of ammonia; one for bacteria, fluoride, potassium and detergents; and one for total nitrogen and total phosphorus. The procedure for collecting a water sample is as follows:

1. Put on gloves;
2. When possible, sample the flow directly in a clean, glass bottle or sterilized plastic bottle or bag;
3. Be sure to rinse the bottle once with flow from the sample water for conditioning;
4. If a dipper, bailer, bucket or other device is used to collect a sample, be sure that they are conditioned with the flow prior to final collection as well;
5. Sample bottles are to be labeled with the appropriate outfall ID, date of collection, and sample collector initials using a water-proof marker;
6. Collect replicates as specified for local program, if needed; and
7. Put samples for lab in cooler with ice.

Next, conduct the ammonia test following the instructions provided by the manufacturer of the test kit. Record the results on the ORI from. Be sure to rinse probes/cuvets with distilled water after sample analysis.

Lastly, measure the flow rate at all flowing outfalls. Flow measurements can be difficult to accurately collect in certain situations, for example, when the flow is too large or too little to collect with the chosen container. As such, three methods are presented and are listed in priority preference:

***Method 1*:** Utilizing a graduated milk jug marked at 1 Liter and a stopwatch record the amount of time required to fill the jug to 1 Liter. Ensure you are capturing the entire flow. When the flow is only a trickle, use a smaller volume container and follow the same method. The following equation is used to calculate flow: **Discharge = Volume filled (cu. ft.) x Time (sec).** For pipes that are discharging larger volumes where it is not be possible to capture the volume in a graduated container, see Method 2.

Method 2: This method should only be used with a free-flowing outfall (i.e. water drops out of the pipe and falls to the stream channel) and when the depth of flow is relatively uniform. Utilizing a tape measure, record the flow depth in the pipe at the deepest point (thalweg) and the total flow width. Then use the following equation: **Discharge= 3.1 x wetted width (ft) x flow depth (ft) ^1.5**

Method 3: Using a tape measure record the width of the flow. Next measure and record the depth of the flow. Using a measuring tape, ping pong ball, and stop watch, record the length of time it takes to travel a known distance and. Repeat velocity measurement 3-5 times and average the results. Then use the following equations to calculate the flow rate and record the results on the ORI form:

Area= Wetted width (ft) x flow depth (ft)

Velocity= Length of ping pong ball run (ft) / Time (sec)

Discharge= Area x Velocity

All samples collected for external lab analysis should be preserved as specified by the lab for the parameter of interest. See Standard Methods for the Examination of Water and Wastewater for more information about sample collection and sample preservation: http://www.standardmethods.org/. Bacteria samples are to be processed within 6 hours of collection and incubated at the appropriate temperature and for the necessary length of time as indicated by the bacteria plate manufacturer. Results of additional field and/or lab analysis can be recorded on the Outfall Reconnaissance Inventory/ Sample Collection Lab Sheet (Appendix C).

Follow up

All outfalls with a confirmed illicit discharge will require a drainage area investigation as described in the next section. If the outfall is determined to have a potential illicit discharge based on physical indicators, but samples do not exceed established water quality thresholds, the outfall should be re-visited two additional times during the permit cycle to determine if an intermittent discharge may be present. Ideally, one re-visit will occur on a different day of the week than the original visit and/or at a different time of day.

Nitrogen, phosphorus and bacteria pollutant loads can be estimated for each outfall screened through an illicit discharge program. By doing so, the quantitative benefit of removing the illicit discharge can be tracked internally and reported to regulating authorities and the public. Pollutant reductions can be accounted for in MS4 program reports as well as for Total Maximum Daily Load (TMDL) implementation and tracking. By conducting routine outfall screening on a watershed scale in concert with instream monitoring for the same parameters, inferences can be made regarding the illicit discharge pollution load proportional to baseflow conditions.

A pollutant load accounting spreadsheet is provided at www.cwp.org for use in estimating loads from illicit discharges. Total nitrogen and total phosphorus concentrations are required inputs, along with an accurate flow measurement. Standard conversions are used to report results in pounds of nutrients per year and gallons per year. Similar calculations can be computed for bacteria, although these are not included in the spreadsheet.

New outfalls and unmapped stormwater infrastructure should be updated in the jurisdiction's master GIS system as soon as possible at the office after identification. Stormwater pipe mapping should note the direction of flow in addition to pipe location. Any illegal dumping or needed infrastructure repairs found in the field should be reported immediately to the appropriate agency.

Non-routine inspections

If an employee observes evidence of an illicit discharge during an informal or non-routine inspection, he/she should collect as much information about the potential illicit discharge as possible then contact his/her supervisor or dispatch office so that appropriate action can be taken. A tracking sheet or spreadsheet (Table 6) can be used to collect the information observed. While it may not be reasonable to expect all public works employees to have copies of the form at all times, there are other ways to collect the information:

- The person observing the discharge can provide the information verbally to dispatch or the supervisor, who can then complete the Illicit Discharge Tracking Sheet;
- The person can log as much information as they can recall onto the form upon returning to the office; or
- A third party (such as a code enforcement officer) dedicated to inspecting and tracing illicit discharges can be sent to the location as soon as possible where the potential illicit discharge was observed to collect the necessary information directly on the form.

It is important to collect as much information as possible at the time of initial observation because of the likelihood that a discharge may be transitory or intermittent. Initial identification of the likely or potential sources of the discharge is also very important.

Table 6. Illicit Discharge Tracking Sheet						
Date Reported:	**Report Initiated by:** Phone, drop-in, contact information, etc.	**Location of Discharge:** If known – lat/long, stream address or outfall #, nearby landmark, etc.	**Description of Discharge:** E.g. – dumping, wash water suds, oil, etc.	**Actions to be Taken:** Who What, When and How…(what should be done)	**Description of Resolution:** Outcome of Actions taken and any necessary follow-up (what was done)	**Date Resolved:**

Drainage Area and Storm Drain Investigations

An illicit discharge source investigation should be conducted for all outfalls where any of the following apply:

- The overall outfall characterization as determined by the ORI is determined to be "suspect" or "obvious" as indicated in Section 6 of the ORI.
- On-site or lab analysis results in values that exceed established thresholds indicated in Table 2. Thresholds can be adjusted as needed to reflect local conditions.
- A "weight-of-evidence" approach is recommended, that is, using more than one indicator to determine the presence of an illicit discharge.

Table 2. Threshold levels for screening parameters used in illicit discharge surveys		
Parameter	**Threshold**	**Source**
Ammonia	>0.1 mg/L	Brown et al (2004)
E. coli	>235 CFU/100 ml (grab sample)	EPA (1986)
Total coliform	>10,000 CFU/100 ml (grab sample)	California state standard (Dorfman and Rosselot, 2011)
Fluoride	>0.25 mg/L	Brown et al (2004)
Detergents	>0.25 mg/L	Brown et al (2004)
Potassium	>6 ppm	Guidance extrapolated from Lilly and Sturm (2010)

Table 2. Threshold levels for screening parameters used in illicit discharge surveys		
Parameter	**Threshold**	**Source**
Ammonia : potassium ratio	Determine locally	>0.3 based on CWP field studies in the Mid-Atlantic but the ratio varies regionally. Guidance extrapolated from Lilly and Sturm (2010)

An illicit discharge source investigation is conducted to isolate the source of the pollution. There are two types of source investigations: Drainage Area Investigations and Storm Drain Investigations. An illicit discharge that is determined to be likely transient in frequency, entering the storm drain system directly through dumping or spills from the landscape will follow the procedure for a *Drainage Area Investigation*. A continuous or intermittent discharge that likely occurs from direct or indirect entry into the storm drain system from the interaction of pipes underground will follow the procedure for a *Storm Drain Investigation*. Either investigation should be conducted during dry weather.

Public notification may be required in either type of investigation. If right of entry onto private property is required, the jurisdiction will provide a letter/mailer to residents and building owners located within subject drainage basin and/or sewershed notifying them of the scope and schedule of investigative work, and the potential need to gain access to their property to inspect plumbing fixtures. Assessor's records will provide property owner identification.

Drainage Area Investigation

A rapid windshield survey of the drainage area may be used to find the potential discharger or generating sites if the discharge observed at an outfall has distinct or unique characteristics that allow crews to quickly ascertain the probable operation or business that is generating it (Brown et al. 2004). Discharges with a unique color, smell, or off-the-chart indicator sample reading may point to a specific industrial or commercial source.

A rapid drive-by survey works well in small drainage areas, particularly if field crews are already familiar with its business operations. Field crews can match the characteristics of the discharge to the most likely type of generating site, and then inspect all of the sites of the same type within the drainage area until the culprit is found. For example, if fuel is observed at an outfall, crews might quickly check every business operation in the catchment that stores or dispenses fuel.

In larger or more complex drainage areas, GIS data can be analyzed to pinpoint the source of a discharge. If only general land use data exist, maps can at least highlight suspected industrial areas. If more detailed Standard Industrial Classification (SIC) code data are available digitally, GIS can be used to pull up specific hotspot operations or generating sites that could be potential dischargers.

Storm Drain Investigation

In a Storm Drain Investigation, field crews strategically inspect manholes within the storm drain network system to measure chemical or physical indicators that can isolate discharges to a specific segment of the network. Once the pipe segment has been identified, on-site investigations are used to find the specific discharge or improper connection. This method involves progressive sampling at manholes in the storm drain network to narrow the discharge to an isolated pipe segment between two manholes. Field crews need to make two key decisions when conducting a storm drain network investigation—where to start sampling in the network and what indicators will be used to determine whether a manhole is considered clean or dirty.

The field crew can sample the pipe network in one of three ways:

- Crews can work progressively up the trunk from the outfall and test manholes along the way.
- Crews can split the trunk into equal segments and test manholes at strategic junctions in the storm drain system.
- Crews can work progressively down from the upper parts of the storm drain network toward the problem outfall.

During a manhole inspection, manholes are opened and inspected for visual evidence of contamination. Where **flow is observed**, and determined to be contaminated through visual indicators or field monitoring, the upstream tributary storm sewer system is isolated for investigation (e.g. further flow inspection, dye testing, CCTV). No additional downstream manhole inspections are performed unless the observed flow is determined to be uncontaminated or until all upstream illicit connections are identified and removed. Where **flow is not observed but an intermittent discharge is suspected** in a junction manhole, all inlets to the structure are partially dammed for the next 48 hours when no precipitation is forecasted. Inlets are damned by blocking a minimal percentage of the pipe diameter at the invert using sandbags, caulking, weirs/plates, or other temporary barriers. The manholes are thereafter re-inspected (prior to any precipitation or snow melt) for the capture of periodic or intermittent flows behind any of the inlet dams. The same visual observations and field testing is completed on any captured flow, and where contamination is identified, abatement is completed prior to inspecting downstream manholes. In addition to documenting investigative efforts in written and photographic form, it is recommended that information and observations regarding the construction, condition, and operation of the structures also be compiled.

Where flow is observed and does not demonstrate obvious indicators of contamination, samples are collected and analyzed and then compared with established benchmark values to determine the likely prominent source of the flow. This information facilitates the investigation of the upstream storm sewer system. Benchmark values may be refined over the course of investigations when compared with the actual incidences of observed flow sources. In those manholes where periodic or intermittent flow is captured through damming inlets, additional laboratory testing (e.g. toxicity, metals, etc.) should be considered where an industrial discharge is suspected.

Adequate storm and sanitary sewer mapping is a prerequisite to properly execute a storm drain investigation. As necessary and to the extent possible, infrastructure mapping should be verified in the field and corrected prior to investigations. This effort affords an opportunity to collect additional

information such as latitude and longitude coordinates using a global position system (GPS) unit if so desired. To facilitate subsequent investigations, tributary area delineations should be confirmed and junction manholes should be identified during this process.

To facilitate investigations, storm drain infrastructure should be evaluated for the need to be cleaned to remove debris or blockages that could compromise investigations. Such material should be removed to the extent possible prior to investigations, however, some cleaning may occur concurrently as problems manifest themselves.

Where field monitoring has identified storm sewer systems to be influenced by sanitary flows or washwaters, the tributary area is isolated for implementation of more detailed investigations. Additional manholes along the tributary are inspected to refine the longitudinal location of potential contamination sources (e.g. individual or blocks of homes). Targeted internal plumbing inspections, dye testing, smoke testing or CCTV inspections are then employed to more efficiently confirm discrete flow sources. More information on these techniques can be found in Brown et al (2004).

Post-Removal Confirmation

As the sources of illicit discharges are confirmed, measures to correct them must be taken, working with the property owner or other responsible party. The exact type of repair needed will depend on the type of discharge and mode of transmission. Additional guidance on eliminating illicit discharges is provided in Brown et al. (2004).

After completing the removal of illicit discharges from a subdrainage area, the subdrainage area is re-inspected to verify corrections. Depending on the extent and timing of corrections, verification monitoring can be done at the initial junction manhole or the closest downstream manhole to each correction. Verification is accomplished by using the same visual inspection, field monitoring, and damming techniques as described above.

In addition to verifying removal of individual illicit discharges, the progress of the IDDE program should be evaluated by tracking metrics such as:

- Number or % of manholes/structures inspected
- Number or % of outfalls screened
- Number or % of illicit discharges identified through:
    - visual inspections
    - field testing results
    - temporary damming
- Number or % of homes inspected/dye tested
- Footage or % of pipe inspected by CCTV

- Number or % of illicit discharges removed
- Estimated flow/volume of illicit discharges removed
- Footage and location of infrastructure jetting/cleaning required
- Infrastructure defects identified and repaired
- Water main breaks identified and repaired
- Cost of illicit discharge removals (total, average unit costs)

Safety Procedures

The field activities described in this guide involve sampling of potentially contaminated water and, as such, have some associated risk. As with any field procedures, appropriate precautions should be taken to ensure the safety of field crews. General and specific suggested safety procedures are provided below.

General suggestions

- While performing field work activities, use appropriate caution, make an effort to recognize potentially dangerous situations while performing field work, and take the proper steps to avoid or minimize them.
- Field work activities should not be performed alone.
- A list of team member and emergency contact numbers should be kept with each field team.
- Long pants and close-toed shoes are strongly recommended.
- Carry adequate water, sunscreen, and bug repellent if needed.
- Employees should use their judgment to ensure their safety while working during inclement weather. It may be necessary to suspend and/or reschedule field work if the weather will not permit safe and effective completion of the activities. Recommended precautions include:
    - Severe heat or cold: Dress appropriately, take breaks as needed to warm up or cool down, and stay hydrated.
    - Thunderstorms: Stop working, get out of the water, if applicable, and take shelter if there is a threat of lightning strikes.
    - Snowstorms, flooding, tornadoes, and other dangerous weather: Field work should be stopped or canceled if dangerous weather arises or is predicted.

- Each field work team should have a functioning mobile phone and a fully-stocked first aid kit.

Public roadways

- Whenever work will be performed in or near a public roadway, wear a high-visibility safety vest.

Manholes and similar structures

If a manhole cover or similar structure must be removed (in order to determine sewer line configuration, for example):

- Safety-toe footwear (steel-toed shoes) should be worn.
- Lifting manhole covers should be done with the proper tools and technique so as to avoid injury.
- The open cover should only remain open as long as necessary to gather the required information, and should never be left unattended.
- Due to the potential dangers of confined spaces, do not enter a manhole or put your head below the rim of the opening.

Stream walks and illicit discharges

- Properly fitting waders with high-traction soles should be worn when walking in a stream.
- Rubber gloves should be worn if contact with polluted water is expected.
- Skin contact with suspected illicit discharges should be avoided.
- Hand sanitizer and/or careful hand washing should be employed after potential contact with polluted water.
- High-visibility orange or yellow vests should be worn during hunting season.
- Wear safety goggles when performing any chemical tests.
- Reagents and other chemicals should be used and disposed of properly by following the guidance on the MSDS safety sheets.

References Cited

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APPENDIX A. OUTFALL RECONAISSANCE INVENTORY (ORI) FORM

OUTFALL RECONNAISSANCE INVENTORY/ SAMPLE COLLECTION FIELD SHEET

Section 1: Background Data

Subwatershed:		Outfall ID:	
Today's date:		Time (Military):	
Investigators:		Form completed by:	
Temperature (°F):	Rainfall (in.): Last 24 hours:	Last 48 hours:	
Latitude:	Longitude:	GPS Unit:	GPS LMK #:
Camera:		Photo #s:	

Land Use in Drainage Area (Check all that apply):

☐ Industrial ☐ Ultra-Urban Residential ☐ Commercial ☐ Open Space ☐ Suburban Residential ☐ Institutional

Other: _____ Known Industries: _____

Notes (e.g., origin of outfall, if known):

Section 2: Outfall Description

LOCATION	MATERIAL	SHAPE	DIMENSIONS (IN.)	SUBMERGED
☐ Closed Pipe	☐ RCP ☐ CMP ☐ PVC ☐ HDPE ☐ Steel ☐ Other: _____	☐ Circular ☐ Single ☐ Elliptical ☐ Double ☐ Box ☐ Triple ☐ Other: _____ ☐ Other: _____	Diameter, circular: _____ Box: h - _____ w - _____ Elliptical: h - _____ w - _____	In Water: ☐ No ☐ Partially* ☐ Fully* With Sediment: ☐ No ☐ Partially ☐ Fully
☐ Manhole				
☐ Open drainage	☐ Concrete ☐ rip-rap ☐ Earthen ☐ Other: _____	☐ Trapezoid ☐ Other:_____ ☐ Parabolic	Depth: _____ Top Width: _____	Bottom Width: _____
☐ In-Stream	Complete Stream Discharge form			
Flow Present?	☐ Yes ☐ No *If No, Skip to Section 5*	Flow Description ☐ Trickle	☐ Moderate	☐ Substantial
*Tidal?	☐ Yes ☐ No	If yes, *stage* ☐ Flood ☐ Ebb Time:		

Section 3: Quantitative Characterization

FIELD DATA FOR FLOWING OUTFALLS				
PARAMETER		RESULT	UNIT	EQUIPMENT
☐Flow #1	Volume		Liter	Bottle
	Time to fill		Sec	Stopwatch
☐Flow #2 (only for free-flowing outfalls)	Flow depth		In	Tape measure
	Wetted width		ft	Tape measure
☐Flow #3	Flow width	_____' _____"	Ft, In	Tape measure
	Flow depth		In	Tape measure
	Time of travel (avg)	1._____2._____3._____	Sec	Stop watch
	Measured length	_____' _____"	Ft, In	Tape measure
Ammonia			mg/L	Specific ion probe Type:

Outfall Reconnaissance Inventory Field Sheet

Section 4: Physical Indicators for Flowing Outfalls Only

Are Any Physical Indicators Present in the flow? ☐ Yes ☐ No *(If No, Skip to Section 5)*

INDICATOR	CHECK if Present	DESCRIPTION	RELATIVE SEVERITY INDEX (1-3)		
Odor	☐	☐ Sewage ☐ Rancid/sour ☐ Petroleum/gas ☐ Sulfide ☐ Other:	☐ 1 – Faint	☐ 2 – Easily detected	☐ 3 – Noticeable from a distance
Color	☐	☐ Clear ☐ Brown ☐ Gray ☐ Yellow ☐ Green ☐ Orange ☐ Red ☐ Other:	☐ 1 – Faint colors in sample bottle	☐ 2 – Clearly visible in sample bottle	☐ 3 – Clearly visible in outfall flow
Turbidity	☐	See severity	☐ 1 – Slight cloudiness	☐ 2 – Cloudy	☐ 3 – Opaque
Floatables -Does Not Include Trash!!	☐	☐ Sewage (Toilet Paper, etc.) ☐ Suds ☐ Petroleum (oil sheen) ☐ Other:	☐ 1 – Few/slight; origin not obvious	☐ 2 – Some; indications of origin (e.g., possible suds or oil sheen)	☐ 3 - Some; origin clear (e.g., obvious oil sheen, suds, or floating sanitary materials)

Section 5: Physical Indicators for Both Flowing and Non-Flowing Outfalls

Are physical indicators that are not related to flow present? ☐ Yes ☐ No *(If No, Skip to Section 6)*

INDICATOR	CHECK if Present	DESCRIPTION	COMMENTS
Outfall Damage	☐	☐ Spalling, Cracking or Chipping ☐ Peeling Paint ☐ Corrosion	
Deposits/Stains	☐	☐ Oily ☐ Flow Line ☐ Paint ☐ Other:	
Abnormal Vegetation	☐	☐ Excessive ☐ Inhibited	
Poor pool quality	☐	☐ Odors ☐ Colors ☐ Floatables ☐ Oil Sheen ☐ Suds ☐ Excessive Algae ☐ Other:	
Pipe benthic growth	☐	☐ Brown ☐ Orange ☐ Green ☐ Other:	

Section 6: Overall Outfall Characterization

☐ Unlikely ☐ Potential (presence of two or more indicators) ☐ Suspect (one or more indicators with a severity of 3) ☐ Obvious

Section 7: Data Collection

1.	Sample for external lab?	☐ Yes	☐ No	2.	Sample for CWP?	☐ Yes	☐ No	3.	Sterile sample for bacteria analysis?	☐ Yes ☐ No
4.	Sample(s) collected from:	☐ Flow	☐ Pool							
5.	Duplicate collected?	☐ Yes	☐ No	*If yes, check appropriate:*		☐ External lab	☐ CWP	☐ Sterile		

Section 8: Any Non-Illicit Discharge Concerns (e.g., trash or needed infrastructure repairs) or other Notes?

Center f

APPENDIX B. MAPPING THE SYSTEM

This section was modified from the New Hampshire Estuaries Project, November, 2006 "*Guidelines and Standard Operating Procedures: Illicit Discharge Detection & Elimination and Pollution Prevention / Good Housekeeping."* Pp. 17-18.

Completing a map of the storm drain system is best accomplished through the use of geographic information systems (GIS).

A sample strategy for mapping an MS4 community is as follows:

1. Review/Office Preparation:

   a. Check existing available mapping data in high priority areas first, then in medium priority areas, then low priority areas (planning board submittals or as-builts are a good resource for locations).

   b. Decide on and document a numbering or naming system for outfalls and other structures. Establishment of a simple unique numbering system (SWO-0001, SWO-0002, etc.) will facilitate future inspections and documentation of maintenance.

   c. Select a method to mark outfalls in the field (using spray paint, paint pen, or signs or markers), and place an order for necessary materials. (Marking the outfalls ensures they can be consistently identified in the field, but is not required.)

   d. Obtain equipment for mapping (see Equipment List).

   e. Develop a schedule for completing (use town or city parcel grid or watershed areas).

   f. Conduct preliminary reconnaissance to evaluate if watercraft are necessary to view the banks of the waterbody.

2. Field check:

   a. Using existing paper maps as a basis for locations, field personnel should start a mapping program by walking all named waterbodies within a given area of the community and collecting outfall location and design information using global positioning system (GPS) equipment capable of sub-meter (approximately 3-foot) accuracy. Use of a data logger and data collection software, such as Pathfinder®, will allow the generation of GIS files that will be useful for many years. Utilize the Outfall Reconnaissance Inventory (ORI) form for outfall characterization.

Equipment List for mapping:

1. Existing paper maps
2. Field sheets
3. Camera
4. GPS unit
5. Spray paint
6. Cell phone or handheld radio
7. Clip boards and pencils
8. First aid kit
9. Flashlight
10. Protective gloves
11. Tape measure
12. Waders
13. Temperature probe
14. Sop watch
15. Sample bottles
16. Dry erase board (for photos)
17. Hand sanitizer
18. Sampling pole
19. Mirror (for light)
20. Safety vests

b. Collect dry weather inspection information whenever possible. Dry weather discharge information can either be collected on the paper forms for manual entry into a separate database at a later time, or can be directly entered into a database on a laptop or the data logger on-site.

c. Mark the outfall with its identifier for future location and easy reference using spray paint, paint markers, or pre-manufactured signs.

3. Develop Initial GIS Maps: If the storm drain system is being mapped as part of a larger GIS database for the municipality, the data collected can be displayed with any of the existing data sets. If the storm drain system is not part of a larger data set, the Program Manager must determine what background the maps should be displayed on, such as an aerial photograph, United States Geological Survey (USGS) quadrangles, or a set of roads, political boundaries, waterbodies, and watershed information.

4. Review and field check other structures (catch basins, culverts, pipes, ditches, drain manholes, etc.):

a. Scan and digitize any paper maps of the system into GIS-compatible files or use aerial photographs to identify point structures. An efficient way to do this is to send field staff along with catch basin cleaning crews to confirm catch basin locations, to observe the interior of structures, to determine which pipes enter and leave the structure, and to obtain design information on the pipes and structures. A GPS unit with a data logger can be used to record the location and design information related to the structures.

b. Field check digitized data.

c. Assign unique identifiers to remaining structures (CB-00X for catch basins, DMH-00X for drain manholes, etc.), and a set of attributes and allowable fields to describe the structure.

5. Incorporate field data into GIS and revise as necessary: Once the GPS data files have been converted into GIS layers, and revised maps have been produced, these maps should be proofed to assess their accuracy and completeness. The reviewer should document any additional data requirements, and correct any errors in the information collected. A relational database can help illustrate connections between pipes, outfalls, and other structures.

It should be noted that there are many possible mapping strategies for a given municipality depending on the amount and format of available storm drain system data and the resources that are available. The strategy described above is presented as one way to complete mapping. For a small to medium size community (6,000 to 10,000 people), this process could take approximately two years to complete, depending upon availability of resources and land use.

APPENDIX C. Outfall Reconnaissance Inventory/ Sample Collection Lab Sheet

Subwatershed:	Outfall ID:
Today's date:	Duplicate? (yes/no):
Analysis Technician:	Form completed by:

LAB DATA FOR FLOWING OUTFALLS

PARAMETER	RESULT		UNIT	EQUIPMENT
Ammonia QC check (10% of samples)			mg/L	Colorimeter
Fluoride			mg/L	Specific ion probe
Potassium			ppm	Compact Ion Meter
Conductivity			µs	Conductivity Meter
Bacteria	***Count***	***Dilution (1:1 or 1:100)***		
Red w/ gas			CFUs	Petrifilm plate
Blue w/ gas			CFUs	Petrifilm plate

EXHIBIT 5 – IDDE Reporting Form

NPDES Small MS4 General Permit
Illicit Discharge Reporting Form

State of Ohio Environmental Protection Agency
Division of Surface Water

In accordance with Part III.B.3.j.v of OHQ000004, use this form to notify Ohio EPA if any of the following illicit discharges are detected discharging to your MS4:

- Illicit sanitary cross connections from industrial, commercial, or multi-family sources; and
- Leaking or broken sanitary sewer lines that are actively contributing sewage to your MS4.

Within 24 hours of discovery of the source of the illicit discharge, this form is to be completed and emailed to the appropriate Ohio EPA district office using one of the following addresses:

Southeast District Office: ***sedo24hournpdes@epa.ohio.gov***
Southwest District Office: ***swdo24hournpdes@epa.ohio.gov***
Northwest District Office: ***nwdo24hournpdes@epa.ohio.gov***
Northeast District Office: ***nedo24hournpdes@epa.ohio.gov***
Central District Office: ***cdo24hournpdes@epa.ohio.gov***

Permittee Information					
Name of MS4 Permittee:					
NPDES Facility Permit Number:					
Contact Name for Permittee:					
Contact Telephone Number:	( ) -				
Contact Email Address:					
Illicit Discharge Information					
Please provide: • A general description of the illicit discharge that was detected, • An estimate of volume (gpd), • The identified source (if known), • Any analytical data (if taken), • Potential for human contact (low, medium, high), and • Is there any evidence of any distressed or dead wildlife?					
Date/time illicit discharge began: ☐ Unknown		Date:	/ /	Time:	
Date/time illicit discharge discovered:		Date:	/ /	Time:	
Location of the illicit discharge (lat/long):					
Stormwater Outfall ID/Number (if known):					
Did discharge reach a water of the state?				☐ Yes	☐ No
If Yes, list affected waterbodies:					
Who else have you notified? (fire department, health department, water treatment plant, downstream MS4, facility responsible, etc.) include contact name(s) and phone number(s):					
Has illicit discharge been eliminated?				☐ Yes	☐ No
If Yes, date/time illicit discharge eliminated:		Date:	/ /	Time:	
If No, describe actions taken to contain the illicit discharge and estimated schedule for elimination:					

Exhibit 10 – Memorandum of Understanding

LORAIN COUNTY GENERAL HEALTH DISTRICT
9880 SOUTH MURRAY RIDGE, ROAD
ELYRIA, OHIO 44035

TELEPHONE
Area Code 440
Elyria 322-6367
Lorain 244-3418
244-2209

Fax Line 322-0911

"For The Health of Us All"

David Covell, RS, MPH
Health Commissioner

November 10, 2016

To: All Designated Lorain County NPDES Small MS4 Communities

RE: Notice of Intent to Provide Assistance

The Lorain County General Health District has a responsibility to protect public health and the environment within our jurisdiction. One of these responsibilities is to assist with the identification, reduction, and elimination of non-point sources of pollution that can be attributed to poorly maintained or failing sewage treatment systems. These sources are included in the definition of an illicit MS4 discharge.

Our agency has and will continue to offer assistance to our communities to identify and remediate malfunctioning and failing sewage treatment systems. We are further committed to working collaboratively with our communities in determining solutions for the elimination of these sources as illicit discharges.

Our agency also serves as an educator in our communities. We provide information on the importance of proper and routine maintenance of sewage treatment systems to residents, business owners, and community groups. Educational materials are available for distribution and we are also able to offer speaking opportunities.

Beginning January 1, 2017, all designated Lorain County NPDES Small MS4 Communities will be under the jurisdiction of the Lorain County General Health District.

Sincerely,

Jill Lis, R.S.
Director of Environmental Health
(440) 284-3224
jlis@loraincountyhealth.com

MEMORANDUM OF UNDERSTANDING

Between

Lorain County Engineer, Lorain County, Ohio

and

Lorain County Commissioners, Lorain County, Ohio

and

Lorain Soil & Water Conservation District

On this 23 day of September 1980, this Memorandum of Understanding was entered into by and between the Lorain Soil and Water Conservation District, State of Ohio, hereinafter called the District; the Lorain County Commissioners, State of Ohio, hereinafter called the County; and the Lorain County Engineer, State of Ohio, hereinafter called the Engineer.

Recognizing the need for close working relationships in carrying ou the responsibilities for which each is charged, the County, Engineer, and District enter into this Memorandum of Understanding as the foundation for the enduring cooperative working relationship. Such cooperation allows for joint effort in the solution of problems relating to the planning and development of soil and water resources in Lorain County.

Whereas, the Ohio Drainage Law designates specific authorities and responsibilities to the Engineer and the County for the purpose of constructing and maintaining improvements enhancing water management in Lorain County, and the District has judged the construction and maintenance of such improvement to be necessary and complimentary to the conservation and development of the land and water resources of Lorain County,

Within the limitations of authorities, resources, and established policies of the District and its cooperating agencies,

The District will:

1. Make technical assistance available to the County and the Engineer, as requested.

2. Provide information and educational materials to guide proper land use patterns.

3. Provide materials and secretarial help to prepare soil and water resource plans, as funds permit.

4. Advise the County on planning and development programs dealing with soil, water and land uses.

5. Inform the County of proposed watershed projects and works of improvement that affect land use planning.

6. Provide the County and Engineer with plans and specifications on proposed group drainage projects for approval and recording.

7. Cooperate with the County and Engineer in promoting maintenance on District group projects.

8. Coordinate with the Engineer for the purpose of construction, maintenance of drainage improvements and other water improvements initiated through petition or mutual agreements the following:

   a. Design criteria and engineering or other data at its disposal, that is pertinent to proposed improvements.

   b. Policies and procedures, as set up for mutual agreement improvements.

   c. Construction and inspection of completed mutually agreed to improvements for adherence to approved design, as requested by the Engineer.

   d. The organization of lay committees for the purpose of viewing improvements regularly, determining maintenance needs, and reporting the same to the Engineer.

   e. Information activities for public understanding and acceptance of improvements and their maintenance.

   f. Recommendations for adjustments in the procedures for improved services.

   g. The gathering of watershed and other resource data to expedite the construction and maintenance of improvements under the provisions of the Ohio Drainage Laws.

9. Provide assistance to the County and Engineer with the interpretation of the Lorain County Soil Survey.

10. Review water disposal and erosion problem areas. Recommend vegetative and/or structural measures necessary to alleviate the problem.

11. Predict potential water disposal and erosion problems that will be created by uncontrolled urban development and other changes in land use. Recommend the need for and type of control measures that should be incorporated in a development plan.

12. Provide consultive assistancee in the investigation, design criteria, specifications,, and construction procedures for conservation measures.

13. Make recommendations on the installation of project measures.

14. Assist in conducting inventories of resources.

15. Counsel with the planning commission and planning consultants on the County's objectives for long-range development.

16. Follow established procedures in contacting the Ohio Utilities Protection Service and other utility companies about about the location of utility lines within proposed construction areas.

The County will cooperate with the District in the development and implementation of long-range land and water use programs, utilizing such resource information as that made available by the Soil Conservation Service and other cooperating resource agencies.

The County will:

1. Observe principles of sound soil and water conservation, giving consideration to the need for water disposal and drainage, erosion control measures, stabilization of sediment producing areas, proper disposal of pollutants, beautification and maintenance of these practices.

2. Consult with the District in the development of future plans concerning long-range development for the County. Use the soil interpretation maps made available by the District and the Soil Conservation Service in preparing the plans.

3. Provide the necessary funds to employ personnel, furnish office space, and equipment, mutually agreed to by the County and the District.

4. Expedite the legal function and procedures required for the construction and maintenance of improvement under the provisions of the Ohio Drainage Laws.

5. Participate annually in a general field inspection in cooperation with the District and the Engineer, for the purpose of viewing improvements and evaluating maintenance conditions.

6. Refer to the District any proposed future urban and rural development projects for review and for technical opinions on the effect that the project may have on the land use, the soil and water problems that may develop, and the measures that may be needed to alleviate them.

7. Adopt and apply those recommendations made by the District which are acceptable to the County and in compliance with any ordinances.

8. Follow policies and procedures set up for mutual agreement improvements.

9. Be responsible for seeing that builders and developers incorporate into their plans, any soil and water resource plans and interpretive material supplied to them by the District and the Soil Conservation Service.

The Engineer will cooperate with the District in establishing policy and procedures to expedite the improvement and maintenance of drainage and other works of improvement initiated through the mutual agreement or petition process in Lorain County.

The Engineer will:

1. Cooperate with the District in establishing acceptable standards for the design of water management improvements and their maintenance.

2. Consult with the District in establishing the basic criteria for determining benefits to property owners from a drainage improvement that was constructed by mutual agreement or the petition process of the Ohio Drainage Law.

3. Observe the principles of a sound soil and water conservation program by considering the need for water disposal and drainage, erosion control measures, stabilization of sediment producing areas, the proper disposal of pollutants, and the maintenance and beautification of these practices.

4. Make available to the District engineering or other information that would be useful in conducting an information or education program.

5. Consult with the District at least annually, to explore improved methods for the construction and maintenance of soil and water improvements.

6. Follow policies and procedures set up for mutual agreement improvements.

7. Follow established procedures in contacting the Ohio Utilities Protection Service and other utility companies about the location of utility lines within proposed construction project areas.

It is mutually agreed that:

1. The District, County, and Engineer will meet periodically to review, and where possible, coordinate their individual programs and activities for maximum mutual benefit.

2. That the type of materials and technical data needed to give competent consultive service will be agreed upon, and prior to the publication of this material will be reviewed by all parties and credit will be given in the publication to the County, Engineer, District, or other cooperating agencies.

3. To place all group drainage projects under maintenance, as specified in the Ohio Drainage Laws.

4. This Memorandum of Understanding may be amended or terminated at any time by mutual consent of the parties involved. It may be terminated by any one of the parties involved by giving written notice to the other parties a sixty (60) day notice of their intent to terminate the agreement.

It is further understood that this Memorandum becomes effective on the signing of all parties involved, and that each party is obligated by this Memorandum only to the extent that funds and personnel are available for carrying out the provisions of this Memorandum.

This Memorandum does not alter or relieve the Engineer or the County from the legal responsibilities assigned by the existing Ohio Drainage Laws.

This Memorandum is executed and agreed to on the 23 day of September, 1986.

Lorain County Commissioners

By: Herbert J. Jacoby

Title: President -Lorain County Commissioners

Date: 9/23/86

Lorain County Enginner

By: Lawrence O. McGlincy

Title: Lorain County Engineer

Date: October 1, 1986

Lorain Soil & Water Conservation District

By: Russell Lockwood

Title: Chairman, Board of Supervisors

Date: October 28, 1986

Reviewed by the Lorain County Prosecutor's Office

By: John S. Keresztes, Jr.
Assistant County Prosecutor

Date: 9/23/86

Exhibit 11 – Table of Organization

2020 Lorain County EPA Phase II Storm Water Management Program Table of Organization

Lorain County Commissioners 440-329-5111

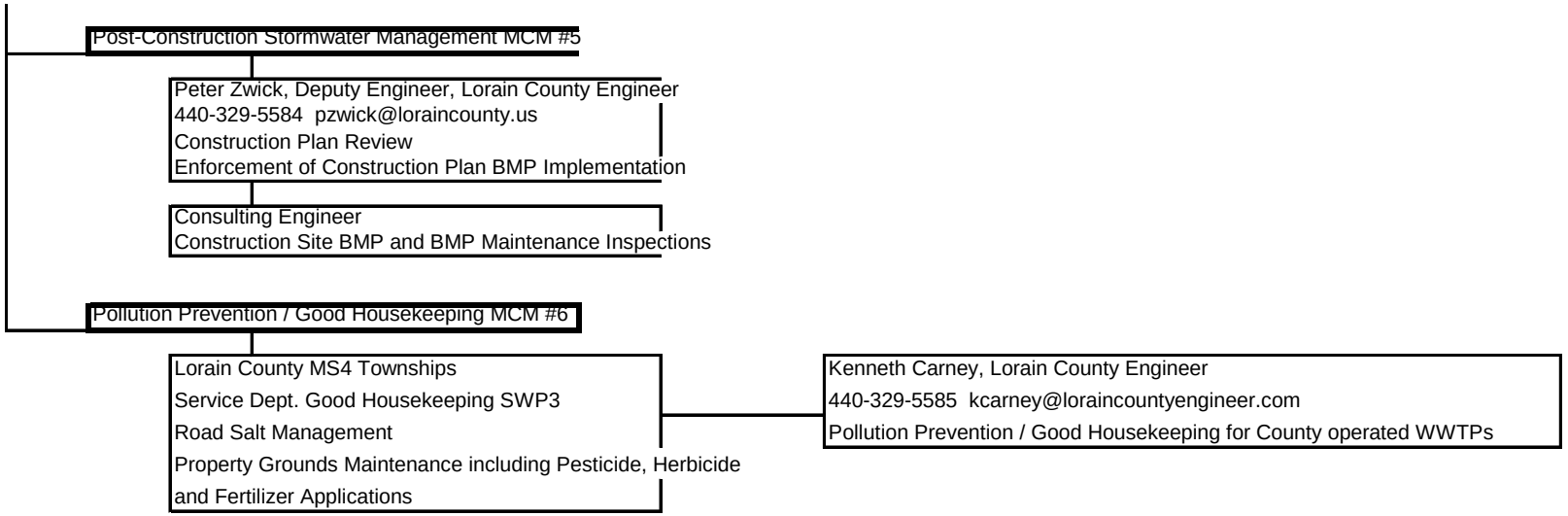
Matt Lundy Michelle Hung David Moore

J.R. White, County Administrator
440-329-5760 jwhite@loraincounty.us

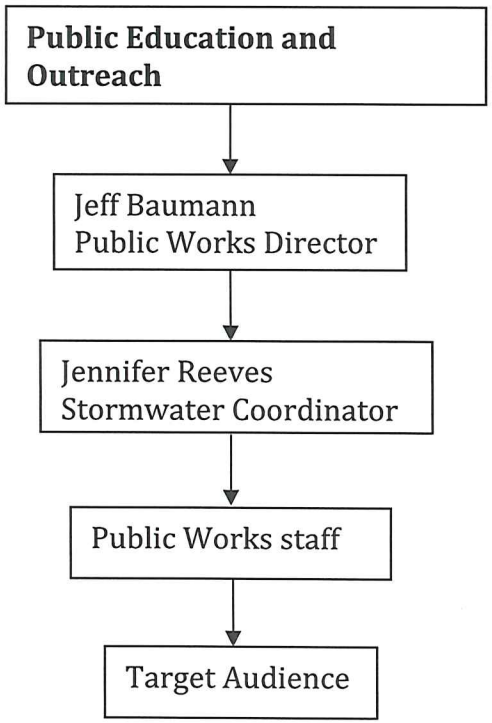
Rob Duncan, Director
Lorain County Community Development
440-328-2323 rduncan@loraincounty.us

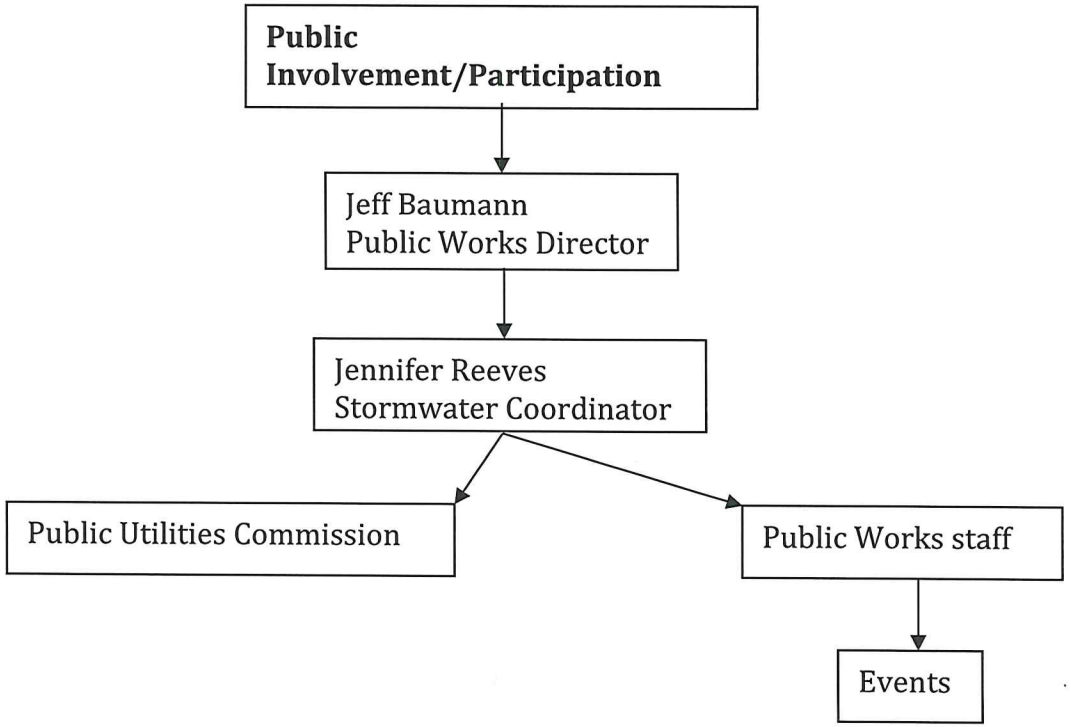
Don Romancak, Storm Water Coordinator
Lorain County Community Development
440-328-2325 romancakd@loraincounty.us

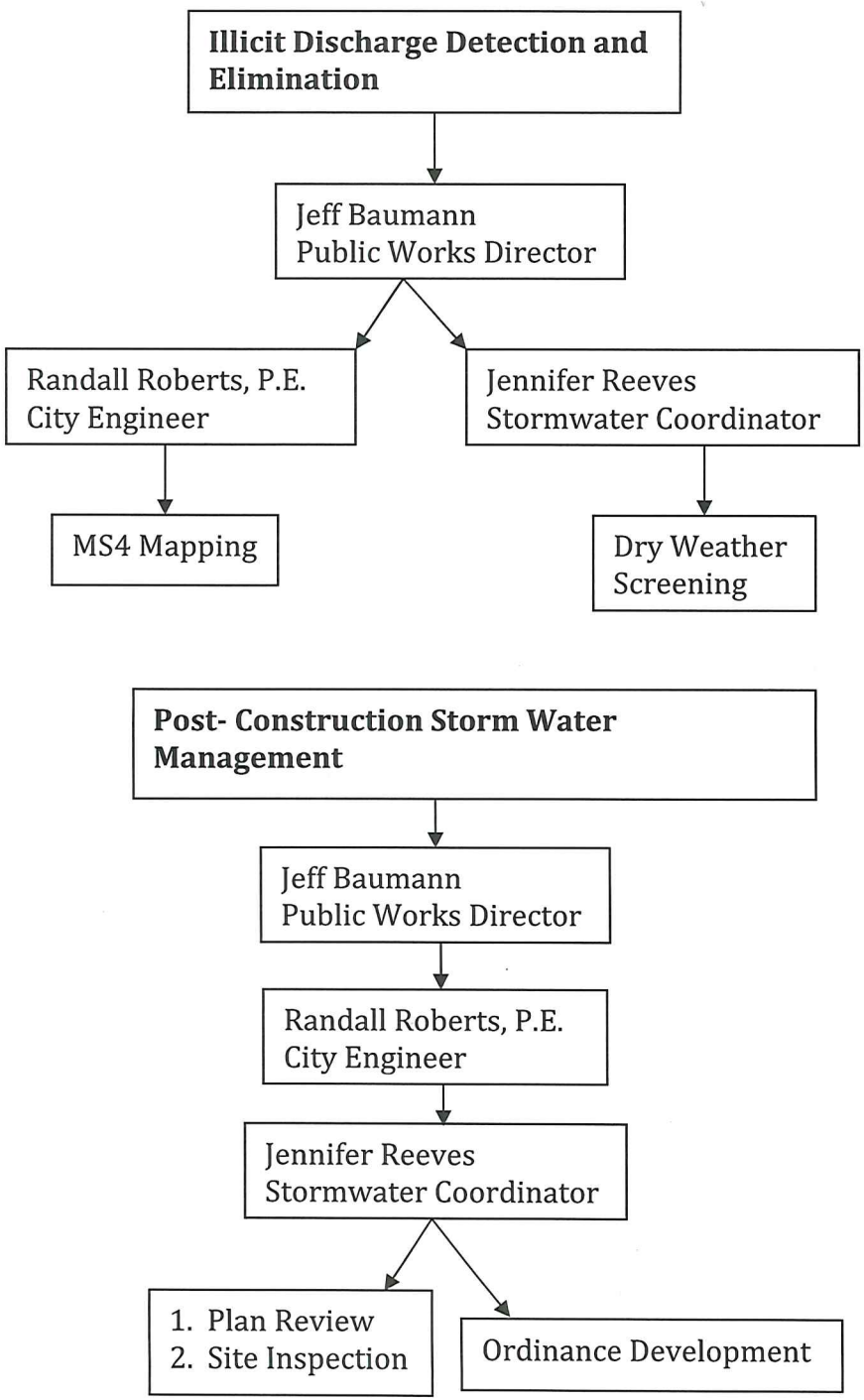
- Public Education and Outreach MCM #1
- Public Involvement / Participation MCM #2
  - Virginia Haynes, Economic Development Specialist
    Lorain County Community Development
    440-328-2362 vhaynes@loraincounty.us
  - , Solid Waste Management District
    440-329-5442
    Pride Day and Recycling Programs
- Illicit Discharge Detection & Elimination MCM #3
  - Mark Adams, Health Commissioner, Lorain County General Health District
    440-284-3219 madams@loraincountyhealth.com
    Investigation & Enforcement of Failing Private Sewage Systems with the Lorain County General Health District.
    Coordinate Storm Outfall Screening/Sampling
    Coordinate Updating of MS4 and HSTS Mapping.
    - Lorain County MS4 Townships
      Coordinate All Illicit Discharge Investigations
      Storm Outfall Screening and Sampling
- Construction Site Stormwater Runoff Control MCM #4
  - Ariel Ruzika, Urban Erosion & Stormwater Specialist, Lorain SWCD
    440-326-5808 aruzika@loraincounty.us
    Enforcement of Construction Plan Erosion/Sediment Control
    Construction Site Erosion/Sediment Control Inspections
    - Matthew Arnold, Operation & Investiation Manager
      Lorain County Storm Water Management District
      440-328-2364 marnold@loraincounty.us
      Construction Site Erosion/Sediment Control Inspections

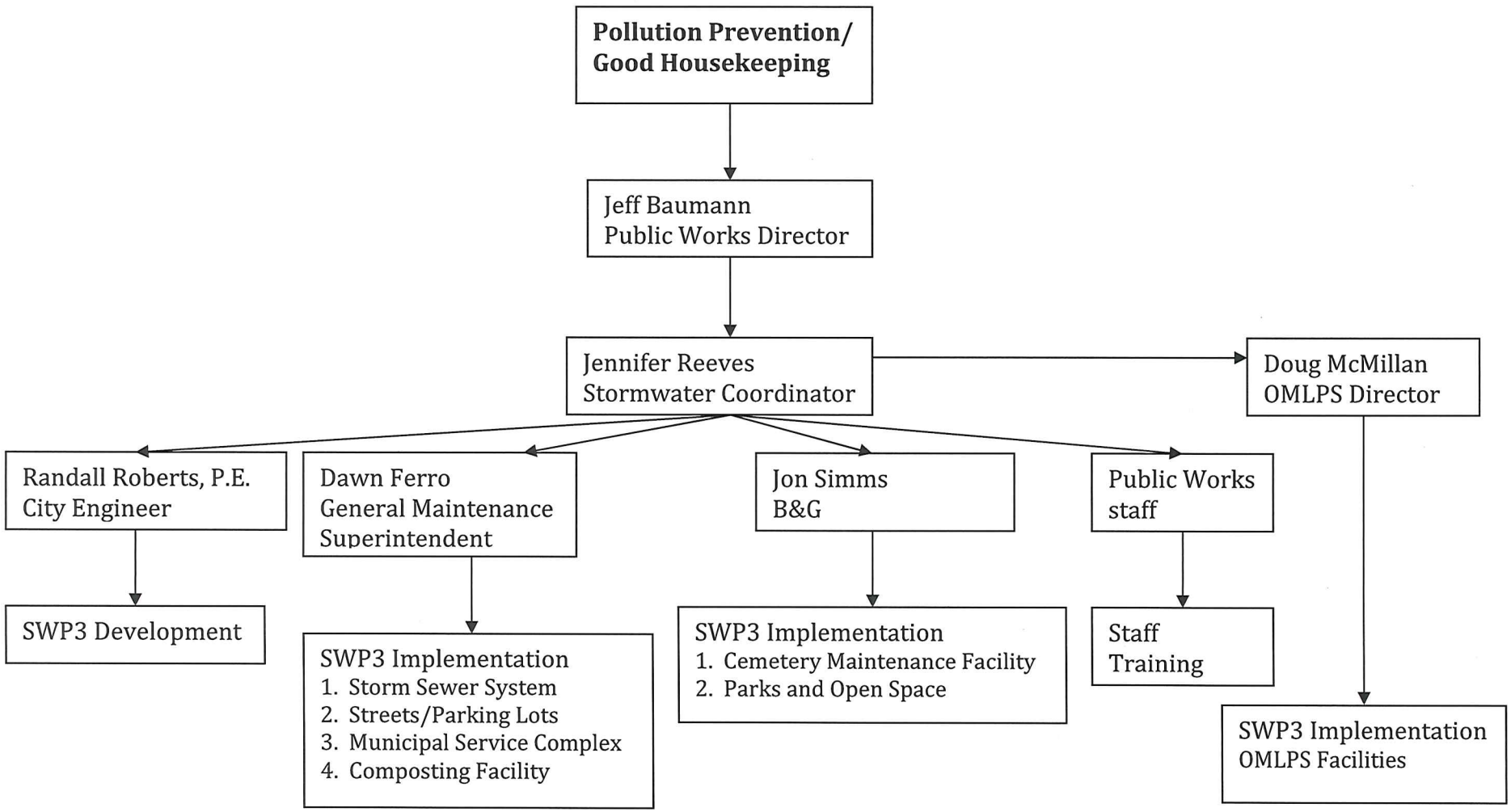

Post-Construction Stormwater Management MCM #5
Peter Zwick, Deputy Engineer, Lorain County Engineer
440-329-5584 pzwick@loraincounty.us
Construction Plan Review
Enforcement of Construction Plan BMP Implementation
Consulting Engineer
Construction Site BMP and BMP Maintenance Inspections
Pollution Prevention / Good Housekeeping MCM #6
Lorain County MS4 Townships
Service Dept. Good Housekeeping SWP3
Road Salt Management
Property Grounds Maintenance including Pesticide, Herbicide and Fertilizer Applications
Kenneth Carney, Lorain County Engineer
440-329-5585 kcarney@loraincountyengineer.com
Pollution Prevention / Good Housekeeping for County operated WWTPs

City of Oberlin
MS4 - Permit OHQ000003
Table of Organization






Illicit Discharge Detection and Elimination
Jeff Baumann
Public Works Director
Randall Roberts, P.E.
City Engineer
Jennifer Reeves
Stormwater Coordinator
MS4 Mapping
Dry Weather Screening
Post- Construction Storm Water Management
Jeff Baumann
Public Works Director
Randall Roberts, P.E.
City Engineer
Jennifer Reeves
Stormwater Coordinator
1. Plan Review
2. Site Inspection
Ordinance Development
Construction Site Storm Water Runoff Control
Jeff Baumann
Public Works Director
Randall Roberts, P.E.
City Engineer
Jennifer Reeves
Stormwater Coordinator
1. Plan Review
2. Site Inspection
3. Complaint Investigation
Ordinance Development


Pollution Prevention/
Good Housekeeping
Jeff Baumann
Public Works Director
Jennifer Reeves
Stormwater Coordinator
Doug McMillan
OMLPS Director
Randall Roberts, P.E.
City Engineer
Dawn Ferro
General Maintenance
Superintendent
Jon Simms
B&G
Public Works
staff
SWP3 Development
SWP3 Implementation
1. Storm Sewer System
2. Streets/Parking Lots
3. Municipal Service Complex
4. Composting Facility
SWP3 Implementation
1. Cemetery Maintenance Facility
2. Parks and Open Space
Staff
Training
SWP3 Implementation
OMLPS Facilities